

Narrative Information Sheet

IV.D.1 Applicant Identification

City of Girard

100 W Main St.

Girard, OH 44420

IV.D.2. Funding Requested

IV.D.2.a. Grant Type

Single Site Cleanup

IV.D.2.b. Federal Funds Requested

IV.D.2.b.i Funds Requested

\$500,000

IV.D.2.b.ii Cost Share Waiver

The City of Girard is NOT requesting a cost share waiver.

IV.D.2.c Contamination

Hazardous Substances.

IV.D.3. Location

City of Girard, Trumbull County, Ohio

IV.D.4. Property Information

Girard Leatherworks

1052 N State St.

Girard, Ohio, 44420

IV.D.5. Contacts

IV.D.5.a. Project Director

Lauren Johnson

330-744-2131 ext. 1216 / lauren@regionalchamber.com

11 Central Sq., Suite 1600, Youngstown, OH 44503

IV.D.5.b. Chief Executive/Highest Ranking Elected Official

Mayor James Melfi

330-545-3879 / gmartuccio@cityofgirard.com

100 W Main St. SE #1, Girard, OH 44420

IV.D.6. Population

According to the U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates the City of Girards population is 9,535.

IV.D.7. Other Factors Checklist

| Other Factors | Page # |
|---|-------------------------|
| Community population is 10,000 or less | Yes – pg. 1-2 (above) |
| The applicant is, or will assist, a federally recognized Indian tribe or United States territory. | No |
| The proposed brownfield site(s) is impacted by mine-scarred land. | No |
| Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation | No |
| The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them). | Yes- pg. 1 of Narrative |
| The proposed site(s) is in a federally designated flood plain. | Yes- pg. 2 of Narrative |
| The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures. | No |

Additionally, the Leatherworks project is located in a federally-designated Opportunity Zone census tract 9339.

IV.D.8. Letter from the State or Tribal Environmental Authority

Letter from Ohio Environmental Protection Agency attached.



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

November 19, 2019

U.S. Environmental Protection
Agency, Region 5
ATTN: Matt Didier
77 West Jackson Boulevard
Mail Code SB-5J
Chicago, IL 60604-3507

**Re: General Correspondence
Brownfield
Trumbull County**

Subject: City of Girard Cleanup Grant Proposal

Dear Mr. Didier:

I am pleased to offer Ohio Environmental Protection Agency's (Ohio EPA) support for the City of Girard Cleanup Grant Proposal. The City is applying for a grant totaling \$500,000, which will be used at the former Ohio Leatherworks Property located at 1052 N State Street, Girard, Ohio 44420 and owned by the City of Girard.

The funding the City is requesting will be used to clean the 11.845 acres of a former leather tanning facility. Historically the site was operated by the Ohio Leather Company, which closed in 1970. A waste water treatment plant was located onsite, including three lagoons, to handle the waste water from the tanning operations. Other sources of contamination include titanium shavings, used grinding wheels, and totes of high pH solids disposal from the tanning operations. The main tanning facility used a significant amount of chemicals with an onsite rail spur for shipment of said chemicals, along with an acid tank and transformer house. If awarded, the cleanup grant is expected to remediate a property adjacent to the Gordon Street neighborhood in Girard, and provide a clean site located directly on United States Route 422 and adjacent to the Mahoning River.

We look forward to working with the City of Girard and U.S. EPA on this project. If you have any questions, please do not hesitate to contact me at 614-644-2295 or via e-mail at Lisa.Shook@epa.ohio.gov.

Sincerely,

Lisa Shook, Manager
VAP, Enforcement, Remediation & Brownfields Section
Ohio Environmental Protection Agency

Cc: James Melfi, Mayor, City of Girard
Natalie Oryshkewych, Ohio EPA, DERR/NEDO

Former Ohio Leatherworks Narrative/Ranking Criteria for Cleanup Grants (170 pts.)

IV.E.1 Project Area Description and Plans for Revitalization (50 pts.)

IV.E.1.a Target Area and Brownfields (15 pts.)

IV.E.1.a.i Background and Description of Target Area (5 pts.)

The City of Girard (City) is a small community located in the Mahoning River Valley, directly north of Youngstown and approximately halfway between Cleveland and Pittsburgh. Girard is located in the heart of the Valley, and historically, the City's economy and challenges have been closely linked to the other communities along the river and the industries which sprang up along its banks. At one time, the Mahoning Valley region produced the second-highest amount of steel in the U.S., after Pittsburgh. The entire region suffered significant decline following the closure of Youngstown Sheet and Tube in 1977, which resulted in the loss of roughly 50,000 jobs. More recently, the community has suffered due to the 2019 deallocation and subsequent closure of the General Motors Lordstown Assembly Plant, just west of Girard, which employed roughly 5,400, and related supplier companies.

IV.E.1.a.ii Description of the Brownfield Site(s) (10 pts.)

The approximately 11.845 acre former Ohio Leatherworks site's operational processes included washing, fleshing, depilation, bathing, tanning, dying, and tempering animal hides with chemicals including sodium sulfide, sodium chloride, lime, ammonia salts, sulfuric acid, chromium sulfate, and mercury between approximately 1902 and 1972. More recent activities included material storage (e.g., titanium shavings, 55-gallon drums, and totes of high pH solids) from approximately 1974 and through 1994. The Property has been vacant since 1994, incurring a large fire in 1995. The remaining onsite structures are overgrown with vegetation and include an underground hide transport tunnel, a pump house, two lagoons, building foundations and several pits. The proposed site and adjacent Mahoning River are separated by a transportation thoroughfare.

IV.E.1.b Revitalization of the Target Area (20 pts.)

IV.E.1.b.i Reuse Strategy and Alignment with Revitalization Plans (10 pts.)

The cleanup of this site aligns with three of the six major priorities identified in the City's 2017 Comprehensive Plan: first, to prepare underutilized former industrial and commercial sites for future redevelopment; second, restore the integrity of the Mahoning River; and third, to connect park and recreational amenities into a cohesive network. The end-use plan for the former Ohio Leatherworks site accomplishes all three of these goals, providing a developable site for future economic growth, remediating a brownfield along the river corridor, and providing a point of access to future recreational use of the Mahoning River corridor.

The bulk of the acreage at the former Ohio Leatherworks site was specifically identified in the comprehensive plan for cleanup and for future light industrial development. Once the site has been cleaned, it will be added to the state of Ohio's economic development site database and marketed for new investment to site selectors and companies. Future development at the site will be evaluated for assistance from state and local incentives. The City will work with their local planning commission and future end users of the property to amend the current zoning classification for these parcels from industrial to an appropriate classification for the proposed reuse of the site.

The cleanup of this site also aligns with the goals of the US-422 Corridor Redevelopment Plan, adopted in 2015. This multi-jurisdictional effort addresses jobs growth, site development, business support, neighborhood stabilization, and natural resources enhancement.

The City plans to use a portion of the former Ohio Leatherworks property as a link to a mixed-use recreational trail along the Mahoning River. The US-422 Plan proposes a trail alignment connecting this spur, tentatively named the Mahoning River Bikeway, south towards Mill Creek Metroparks and downtown Youngstown, and north towards the Niles Greenway and Great Ohio Lake-to-River Greenway. Additionally, a new small craft launch, funded by Ohio Department of Natural Resources, was completed on the Mahoning River in Girard in 2017.

A small northern portion of the former Leatherworks site, adjacent to Little Squaw Creek, is located within a federally-designated 100-year floodplain, and this area will not be developed.

IV.E.1.b.ii Outcomes and Benefits of Reuse Strategy (10 pts.)

Redevelopment of the Leatherworks property will provide two important benefits to the residents of Girard: first, a small portion of the property will provide a trailhead location for the planned Mahoning River bikeway, a proposed spur of the Great Ohio Lake-to-River Greenway.

Second, upon completion of the project, the majority of the property (approximately 5-7 acres) will be made available for new commercial/industrial development. Since the Leatherworks property is located within one of the recently designated federal Opportunity Zones (OZ), the site is included in the recently launched regional investment prospectus and will be promoted to local and nonlocal investors looking for OZ projects. The site will also be marketed for redevelopment through Ohio's database of OZ projects, as well as on ZoomProspector, the state of Ohio's database of available properties.

Successful redevelopment of the site will spur needed economic growth in this OZ. For example, construction of a 50,000 SF light manufacturing project could result in the addition of 53 construction and 120 permanent new jobs [direct, indirect and induced], \$2.7M in added construction and \$6.1M in added permanent annual payroll, and an additional \$911,000 per year in state and local taxes. Source for potential job creation and payroll impacts: IMPLAN.

The cleanup of the Leatherworks property also fits into larger regional efforts centering on the Mahoning River. Efforts are underway to remove the 9 legacy industrial dams along the river - 1 project is under construction, 1 is in design, 3 are funded, and the rest are in the planning stage. The removal of the dams and associated sediment will allow the river to flow freely, improving water quality and restoring natural habitats.

IV.E.1.c Strategy for Leveraging Resources (15 pts.)

IV.E.1.c.i Resources Needed for Site Reuse (10 pts.)

Once the cleanup is completed, the site will be marketed for commercial development opportunities by the YWRC, which will create an online profile for the site in ZoomProspector, the state of Ohio's site database. The site will be submitted for all appropriate property searches for which it meets the basic requirements. The YWRC will also assist potential developers with additional due diligence as necessary to ensure the most appropriate reuse of the site. Once an end user has been identified, additional funding sources to improve the site (through JobsOhio Revitalization funds) will be explored and leveraged.

IV.E.1.c.ii Use of Existing Infrastructure (5 pts.)

The Leatherworks property is located in an industrialized urban area, and all appropriate utilities and infrastructure (4-lane highway, electricity, natural gas, water, sewer, and communications)

are available to the site. Future development at the site should not require upgrades except to tie into existing infrastructure.

IV.E.2 Community Need and Community Engagement (35 pts.)

IV.E.2.a Community Need (20 pts.)

IV.E.2.a.i The Community's Need for Funding (5 pts.)

According to the USEPA's EJSCREEN: Environmental Justice Screening and Mapping Tool, 40% of the City of Girard's population qualifies as Low Income and 61% of the population of Block Group 391559339001, which contains the project site and is the smallest geographic unit for reporting, also qualifies as a Low Income population. Trumbull County has an unemployment rate of 6.1%, which far exceeds the state average of 4.3%. (Ohio Department of Job and Family Services, Ohio Unemployment Rates 2018 Annual Average). The high unemployment and low income limit the income tax collected by the city and hampers the community's ability to pay for brownfield site cleanups of this nature.

IV.E.2.a.ii Threats to Sensitive Populations (15 pts.)

IV.E.2.a.ii.1 Health or Welfare of Sensitive Populations (5 pts.)

According to the US Census Bureau's QuickFacts Community Profile, a number of Sensitive Populations exist within Girard, including:

- Girard's percentage of population 65 years and older, 18.3%, is greater than Ohio's (17.1%) and the USA (16.0%).
- 16.7% persons live in poverty
- 11.8% persons under age 65 have a disability (years 2013-2017)

The Pre-Remedial VAP Phase II Property Assessment conducted in 2016 includes a PROPERTY-SPECIFIC RISK ASSESSMENT (PSRA) that identified complete exposure pathways, such as direct-contact with near surface contaminated soil, that threaten human health. This grant will provide the funding needed to develop and implement remedies that will eliminate these exposures to our sensitive populations.

IV.E.2.a.ii.2 Greater Than Normal Incidence of Disease and Adverse Health Conditions (5 pts.)

The Centers for Disease Control and Prevention's Environmental Public Health Tracking tool collects, analyzes and reports information at the county level and, according to the Trumbull County Combined Health District's Epidemiologist, the findings cannot be attributed to possible effects from pollution at this site. The findings of environmental indicators data generated using USEPA's EJSCREEN: Environmental Justice Screening and Mapping Tool show the population of Block Group 391559339001, which contains the project site and is the smallest geographic unit for reporting, do not have health concerns greater than the state, EPA region and USA averages.

The PSRA identified multiple exposure pathways that exceed maximum concentrations or VAP risk goals. Remedies that will eliminate these exposures will minimize the potential of generating a greater than normal incidence of disease and adverse health conditions in the community surrounding the site.

IV.E.2.a.ii.3 Disproportionately Impacted Populations (5 pts.)

The project site is located within OH Block Group 391559339.001. According to the USEPA's Environmental Justice Online Tool, 61% of the population residing in this Block Group are classified as a Low Income Population, compared to 33% for the State of Ohio and also 33% for

the USA. There is potential that children from this abutting impoverished neighborhood will trespass on the site and come into direct contact with lead-impacted soil. Preliminary discussions for the reclaimed use include a mixed use commercial/recreation component. The desires of the neighboring population will be incorporated into the reclamation plan.

Dust monitoring will occur during the cleanup to ensure that lead and small particulate air emissions will be controlled and will not adversely impact the surrounding residents.

IV.E.2.b Community Engagement (15 pts.)

IV.E.2.b.i Project Partners (5 pts.) and IV.E.2.b.ii Project Partner Roles (5 pts.)

| List of Project Partners | | |
|---|--|---|
| Partner Name | Point of contact (name, email & phone) | Specific role in the project |
| Youngstown/Warren Regional Chamber | Lauren Johnson, lauren@regionalchamber.com, 330-744-2131 | The YWRC represents the business community of the Mahoning Valley, with over 2500 members, and also serves as the lead organization and state of Ohio's local partner for economic development. YWRC will coordinate business engagement, as well as market the site for new development, and coordinate additional resources that will support reuse of the site. |
| Trumbull County Planning Commission | Julie Green, pcgreen@co.trumbull.oh.us, 330-675-2480 | The Trumbull County Planning Commission (TCPC) provides services to the City including comprehensive planning, zoning and land use advising, enterprise zone management, floodplain administration, park and trail planning, and more. The TCPC will assist with community outreach, grant writing and technical assistance, grant administration, and GIS mapping. |
| Girard Multi-Generational Center | Laura Carey, lcd@multigen.org , 330-565-6596 | The Girard Multi-Generational Center will assist with community outreach and provide meeting space for project updates. |
| Girard Free Library | Roseann Lubert, 330-545-2508 ext. 105, Lubertr@girardfreelibrary.org | The Girard Free Library will assist with community outreach and provide meeting space for project updates. |
| Girard 2 nd and 3 rd Ward Block Watch | Mary Ellen Pellegrini, 330-545-0497, [REDACTED]@aol.com | The 2 nd and 3 rd Block Watch will assist with community outreach and encourage residents to provide input on the project. |
| The project partners will provide feedback and technical support to the City aiding them in making decisions with respect to the cleanup and future reuse of the proposed brownfield site(s). The City will be the final authority on making decisions with respect to the cleanup and future reuse of the proposed brownfield site(s), however, project partners, consultants, residents and public officials will all be included in the decision making process. | | |

IV.E.2.b.iii Incorporating Community Input (5 pts.)

The project team has sought community input on the former Ohio Leatherworks property at community meetings prior to beginning the grant process, including two meetings in September with City block watch groups.

The project team will provide quarterly written updates to the community via the City's website, written updates included with City water bills, as well as annual updates to City Council, and periodic updates to interested groups and parties (for example, block watches) by request.

All communications will include a designated point of contact, the project director, to receive and process questions and feedback via phone, email, or in-person updates on the project. The project director will track all comments and questions, will provide a summary of questions to the team, and will ensure that feedback is incorporated into the project where possible and that each inquiry receives an appropriate response.

IV.E.3 Task Descriptions, Cost Estimates, and Measuring Progress (60 pts.)

IV.E.3.a Proposed Cleanup Plan (10 pts.)

The cleanup takes full advantage of the flexibility of the Ohio EPA VAP to meet all applicable environmental laws and regulations, while maximizing protections of human health and the environment, and minimizing the overall cost. The preferred approach will combine source removal and replacement or placement of 2-feet of clean soil over areas impacted by metals and co-mingled petroleum contamination in portions of the site; institute practical land use restrictions (e.g., mandate commercial/industrial land use over portions of the site and prohibit ground water use); and implement a Risk Mitigation Plan (RMP) to protect future construction/excavation workers from potentially impacted soil exceeding direct-contact standards. It is estimated that 8,015 tons of contaminated soil will be required to be removed from the site and disposed of at a properly licensed landfill. Institutional controls consisting of prohibiting ground water use and limiting specific portions of on-site land use to commercial/industrial activities will also be employed.

IV.E.3.b Description of Tasks/Activities and Outputs (25 pts.)

IV.E.3.b.i Project Implementation (10 pts.)

The EPA-funded activities will include the work of a Qualified Environmental Professional (Certified Professional under the Ohio EPA Voluntary Action Program) who will prepare and implement the Quality Assurance Project Plan and oversee the cleanup activities performed by the Remediation Contractors. The Property cleanup will be conducted under the MOA Track of the Ohio EPA Voluntary Action Program, including necessary health monitoring activities.

IV.E.3.b.ii Anticipated Project Schedule (5 pts.)

Cleanup of the Leatherworks Property will be completed within three years (36 months). Planned and achievable EPA-funded activities include preparation of soil remediation bid documents (3 months), bid solicitation/contractor selection (1.5 months), remedial soil actions (3 months), confirmation sampling/analysis (1 month), remedial action report (2 months), and the no further action letter preparation/covenant not to sue document (2 months).

IV.E.3.b.iii Task/Activity Lead (5 pts.)

Activities will be completed by the Project Team: the City (Applicant, fiscal agent), the YWRC (reporting and redevelopment) the TCPC (reporting, administration, community outreach, mapping), and Environmental Consultant - VAP Certified Environmental Professional

(environmental work, monitoring, and reporting to applicable standards). Environmental tasks are as follows:

Task 1: Project Management & Coordination - The Environmental Professional will manage the remedial project tasks and coordinate with Project Team members, the USEPA Project Manager and the Ohio EPA VAP site coordinator. A Quality Assurance Plan (QAPP) for hazardous substances cleanup will be prepared. Following the public comment/response period, the final ABCA document and a Remediation Contractor scope of work for competitive bid will be completed. Entry of the site into the Ohio EPA VAP MOA Track will also be performed under this task.

Task 2: Remedial Actions and Confirmatory Sampling - The soil Remediation Contractor work will generally consist of the excavation, transportation, and disposal of contaminated soil and the replacement with clean soil under the direction of the Environmental Professional. The Environmental Professional will direct and document the excavation activities to be performed by the Remediation Contractor. The soil Remediation Contractor will be responsible for providing all labor, material, equipment, and any permits that may be required to perform the remedial actions. The Environmental Professional will obtain samples for analysis of chemicals of concern along the proposed excavation to confirm that the contamination perimeter meets the appropriate VAP standards (e.g., 800 mg/kg limit for lead within a depth of 0-2 feet). Waste characterization sampling and analysis for toxicity characteristic leaching procedure (TCLP) of soil for disposal must also be conducted prior to off-site disposal.

Task 3: Risk Assessment/Modeling and Risk Mitigation Plan - The Environmental Professional will complete a post-remedial Risk Assessment for the Property to incorporate a Multiple Chemical Adjustment (MCA) into generic VAP standards based on the final residual levels of contaminants in accordance with the Ohio EPA VAP rules. Ground water modeling and contaminant fate and transport modeling will be performed to demonstrate that residual contaminant levels will not adversely impact human health or ecological receptors at the adjacent Squaw Creek and/or Mahoning River. The Environmental Professional will complete a Risk Mitigation Plan (RMP) which will protect workers in the event that future subsurface construction activities encounter contaminated soils. The RMP will also provide guidelines for properly managing contaminated media that may be encountered during construction activities and requirements for restoring any breaches of the point of compliance on the Property.

Task 4: Remediation Report Preparation, Phase I Update and NFA Document Preparation - The Environmental Professional will complete a Remediation Report to summarize the remedial actions implemented on this project. The Phase I report will also be updated in accordance with VAP rules which stipulate that a Phase I report must be completed or updated within 180 days of submittal of a No Further Action (NFA). This task also includes the preparation of the NFA document as well as follow up responses to comments from the Ohio EPA's review of the NFA.

IV.E.3.b.iv Outputs (5 pts.)

Specific project outputs will be programmatically required and easily measured because the project will be performed under the Ohio EPA VAP MOA Track. These include the Phase I update, final Remedial Action Plan, Remediation Completion Report, Risk Management Plan, Risk Assessment, and NFA documents. Progress toward project outputs will be measured by monthly progress meetings between the City and the Environmental Professional, regular public meetings and updated ACRES entries.

| Budget Categories | Task 1 | Task 2 | Task 3 | Task 4 | |
|---|-------------------------|--|--|---|--------------|
| | Proj. Mgt. Coordination | Remedial Actions and Confirmatory Sampling | Risk Assessment /Modeling and Risk Mitigation Plan | Remediation Report Prep, PHI Update, NFA Prep | TOTAL |
| Personnel | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| Fringe Benefits | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| Travel | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| Equipment | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| Supplies | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| Contractual | \$12,730.00 | \$416,307.00 | \$21,420.00 | \$48,580.00 | \$499,037.00 |
| Other | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| Total Direct Costs | \$12,730.00 | \$416,307.00 | \$21,420.00 | \$48,580.00 | \$499,037.00 |
| Indirect costs | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| Total Federal Funding (=<500K) | \$12,730.00 | \$416,307.00 | \$21,420.00 | \$48,580.00 | \$499,037.00 |
| Cost Share (20% of federal Funds) | \$0.00 | \$100,000.00 | \$0.00 | \$0.00 | \$100,000.00 |
| Total Budget (Total Direct+Indirect+ Cost Share) | \$12,730.00 | \$516,307.00 | \$21,420.00 | \$48,580.00 | \$599,037.00 |

Cost Basis Notes:

Task 1 – Project Management & Coordination

- 120 hrs. @ \$106/hr. (weighted average rate) = \$12,730.

Task 2 – Remedial Activities and Confirmatory Sampling

- Oversight 200 hrs. @ \$86/hr. (weighted average rate) = \$17,200.
- Soil Removal/Disposal/Replacement 3,430 tons @ \$96/ton = \$329,280.
- Imported clean fill cover soil 3,083 tons @ \$26/ton = \$80,158.
- Related Contractor cost (e.g., mob/demob, site clearing, AST removal) = \$72,409.
- Environmental Geologist 40 hrs. @ \$80/hr. = \$3,200.
- Subcontractors (Drilling and Laboratory) = \$14,060.

Task 3 – Risk Assessment / Modeling and Risk Mitigation Plan

- 158 hrs. @ \$104.56 (weighted average rate) = \$16,520.
- 50 hrs. @ \$98/hr. (weighted average rate) = \$4,900.

Task 4 – Remediation Report Preparation, Phase I Update, NFA Document Preparation

- 116 hrs. @ \$89.14 (weighted average rate) = \$10,340.
- 196 hrs. @ \$93.06/hr./ (weighted average rate) = \$18,240.
- Ohio EPA Filing Fee = \$20,000.

IV.E.3.d Measuring Environmental Results (5 pts.)

Several significant project **outputs** are referenced within the schedule, task descriptions, and cost estimates provided above. These outputs include the following:

- Project Preparation Document Outputs: QAPP, Final ABCA, Scope of Remedial Actions and Bid Specifications
- Project Execution Outputs: Remediation Activities Report, Phase I Update, Risk Assessment Report, Risk Mitigation Plan, and Operation & Maintenance Plan (for engineering controls), ACRES reporting
- Project Close Outputs: No Further Action documentation submitted to the Ohio EPA, Covenant Not to Sue issued by the Ohio EPA, and ultimately a mitigated Site ready for re-development.

As previously noted, these outputs are incorporated in to the project schedule and will be tracked through monthly progress meetings to ensure timely completion. The costs associated with these separate outputs are included in the budget so that the cost of achieving each output can be monitored and corrective action can be taken, as may be necessary, to ensure project completion within the allotted funding.

IV.E.4 Programmatic Capability and Past Performance (25 pts.)

IV.E.4.a Programmatic Capability (15 pts.)

IV.E.4.a.i Organizational Structure (5 pts.)

The Project Team includes the City as the Applicant, partnering with the TCPC, the YWRC and the city's consultant; Brownfield Restoration Group, LLC. Project partners have extensive experience administering a variety of grant programs including Ohio EPA grants and loans such as the Home Sewage Treatment System Reserve Program and the Water Pollution Control Loan Fund. Individual team members have also contributed to developing a successful WRRSP grant application through the Mill Creek Metro Parks. Brownfield Restoration Group, LLC has extensive knowledge and expertise with environmental assessment and implementation of successful remedial strategies. The combined education and experience of the Project Team assures that the proposed Leatherworks Clean-Up Project, if funded, will be successfully completed within 3 years.

IV.E.4.a.ii Description of Key Staff (5 pts.)

| Our Team | Responsibilities | Years of Experience |
|--|---|---|
| Mayor James J. Melfi, City of Girard | Applicant, Fiscal Agent, Procurement of consultant and remediation contractor | 35 Years' experience in local government |
| Councilwoman Lily Martuccio, City of Girard | Applicant, Fiscal Agent, Procurement of consultant and remediation contractor, Community Outreach | 23 Years' experience in MetroParks operations, trail planning, local government and community development, BA |
| Lauren Johnson, Youngstown-Warren Regional Chamber | Grant writing and administration (including reporting), Redevelopment of site | 4 Years' experience in economic and community development, BA in Government |

| | | |
|---|--|--|
| Julie M. Green, Director, Trumbull County Planning Commission | Technical assistance for procurement, Grant writing and administration (including reporting) | 20 Years' experience in grants, planning and project management, MS Geography |
| Nicholas Coggins, Assistant Director, Trumbull County Planning Commission | Technical assistance for procurement, Grant writing and administration, Community Outreach | 5 Years' experience in grants, BA in Communication Studies, OEPA Granting Writing 101 & 102 certifications |
| Thomas J. Kieran, Trumbull County Planning Commission | Technical assistance for procurement, Grant writing and administration, GIS Mapping | 18 Years' experience in land use planning and GIS, BA in Geography |

IV.E.4.a.iii Acquiring Additional Resources (5 pts.)

The Team has already acquired additional expertise and resources in procuring through a competitive RFQ process meeting the requirements of 2 CFR 200.317 through 2 CFR 200.326 the services of Brownfield Restoration Group, LLC (BRG) to assist with the successful completion of the project. BRG will provide environmental professional (and VAP certified professional) services, has experience on several previous USEPA Brownfield grants, and will oversee the acquisition of additional resources as necessary, such as qualified remediation contractors, analytical laboratory, and drilling.

IV.E.4.b Past Performance and Accomplishments (10 pts.)

IV.E.4.b.i Currently Has or Previously Received an EPA Brownfields Grant (10 pts.)

IV.E.4.b.i.1 Accomplishments (5 pts.)

IV.E.4.b.i.2 Compliance with Grant Requirements (5 pts.)

IV.E.4.b.ii Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (10 pts.)

IV.E.4.b.ii.1 Purpose and Accomplishments (5 pts.)

The City has NOT received an EPA Brownfield Grant but has received other federal or non-federal assistance agreements. Three successful examples include the ongoing Girard Wastewater Treatment Plant Upgrade Project, the West Liberty Street Improvement Project completed in 2015 and the Glendale Avenue Bridge Replacement Project completed in 2017. The City received federal funding in the amount of \$23,000,000 for the Girard Wastewater Treatment Plant Upgrade Project which started in 2018 and is ongoing; the OEPA WPCLF /OWDA Loan funding covers costs associated with major OEPA Wastewater Treatment and Collection System Improvements for the period 2018 to 2020. Outputs include a 2.5 million gallons of wastewater flow equalization storage, increase in the secondary treatment capacity from 7.5 mgd to 12.0 mgd, 60% increase in capacity; including new and renovated trickling filters, final setting tanks, an advanced ultra-violet light disinfection process for all flows prior to discharge and the replacement of all 30 plus year old pumping, screening, settling tank equipment systems and the removal of the conventional hazardous chlorination (disinfection) and dechlorination chemical systems. Outcomes include complete treatment at a later time, compliance with the terms and conditions of the OEPA approved Combined Sewer Long Term Control Plan mandated by the current Federal NPDES Permit for the City, elimination of raw wastewater discharge from CSO's, serves as a complete secondary treatment for millions of gallons of raw or partially treated wastewater reaching the Mahoning River and the removal of two major safety hazards to the plant staff (chlorine gas and sulfur dioxide gas) and nearby

community. The City received state funding in the amount of \$181,130 in 2014 for the West Liberty Street Improvement Project which was completed on time and under budget in 2015; the Ohio Public Works Commission State Capital Improvement Program funds covered costs associated with major renovations, widening and repair to West Liberty Street located in the Central Business District of Girard from the McDonald Village border east approximately 3,325 feet to US422. Outputs include 3,325 l.f. of asphalt resurfacing, widening on the north side of the street between two bridges and 1 ½ milling, partial depth pavement repair and 1 ½ inch asphalt concrete overlay and striping. Outcomes include a 19 Year Useful Life, a safe travel route for almost 9,000 VPD and an improved driving surface reducing wear and tear on vehicles and improving travel routes to downtown business locations. The City received state and federal funding in the amount of \$510,000 for the Glendale Bridge Replacement Project completed in 2017; the ODOT Small Ohio Public Works Commission State Capital Improvement Program funds and the ODOT Small City Program funds covered costs associated with engineering design, demolition of existing structure, installation of replacement concrete bridge, reconstruction of roadway, relocation of water, sanitary sewer and natural gas lines. Outputs include one (1) 32-foot span w/effective height of 7 feet bridge replacement and related appurtenances. Outcomes include bringing condition from critical to excellent status and open to thru traffic and a safe travel route for almost 300 VPD. Each grant award's measure of success is based on outputs and outcomes listed herein and Girard met each projected output and outcome for each of these grant awards. Girard's experience administering grants is extensive and the City is confident that it will successfully carry out the USEPA Cleanup Grant if it is awarded.

IV.E.4.b.ii.2 Compliance with Grant Requirements (5 pts.)

The City complied with each grant award's work plan, schedule, and terms and conditions as specified in the grant agreements. Required reports were filed on time with the appropriate agencies when required. Progress was made on achieving the expected results within the grant timelines. Girard has achieved the expected results of the grants described above as identified in the formal grant agreements and tracks these via state audits as well as through monitoring visits conducted by the various agencies. Measured progress is tracked via reports submitted to the various agencies throughout the grant timeline when applicable and via a Final Performance Report.

IV.E.4.b.iii Never Received Any Type of Federal or Non-Federal Assistance Agreements (5 pts.)

Does not apply.

Former Ohio Leatherworks

III.B. Threshold Criteria for Cleanup Grants

III.B.1 Applicant Eligibility

The City of Girard is an eligible local government as defined by 2 CFR 200.64 to receive funding.

III.B.2 Previously Awarded Cleanup Grants

The former Ohio Leatherworks site has not previously received EPA Cleanup Grant funding, so is eligible to receive funding in FY20.

III.B.3 Site Ownership

The City of Girard is the sole owner of the proposed site and will maintain ownership throughout the entire cleanup process.

III.B.4 Basic Site Information

The former Ohio Leatherworks site consists of three parcels comprising 11.845 acres located at 1052 State St., Girard, OH, 44420. All parcels are solely owned by the City of Girard.

III.B.5 Status and History of Contamination at the Site

The former Ohio Leatherworks site is contaminated by hazardous substances and incidental co-mingled petroleum. Between approximately 1902 and 1972, leather processing operations included washing, fleshing, depilation, bathing, tanning, dying, and tempering animal hides with chemicals including sodium sulfide, sodium chloride, lime, ammonia salts, sulfuric acid, chromium sulfate, and mercury.

More recent activities included material storage (e.g., titanium shavings, 55-gallon drums, and totes of high pH solids) from approximately 1974 and through 1994. The property has been vacant since 1994 and was the site of a large fire in 1995. The remaining onsite structures have been overgrown by vegetation and include an underground hide transport tunnel, a pump house, two lagoons, building foundations and several pits. Past industrial operations have resulted in contaminated ground water exceeding potable use standards for lead and arsenic. Near surface (0-2 ft.) soil contamination exceeds direct contact standards for lead, arsenic, mercury, PCBs, and total petroleum hydrocarbons (TPH).

III.B.6 Brownfields Site Definition

The City of Girard affirms that the site is not listed or proposed for listing on the National Priorities List; not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and not subject to the jurisdiction, custody, or control of the United States government.

III.B.7 Environmental Assessment Required for Cleanup Applications

A Phase II Property Assessment report dated April 12, 2016 was completed in accordance with the Ohio EPA Voluntary Action Program.

III.B.8 Enforcement or Other Actions

To the best of our knowledge, there are no ongoing or anticipated enforcement actions pending for the former Ohio Leatherworks site. The City conducted all appropriate inquiries prior to site

acquisition in 2014, and in the 5 years of ownership, has not received notice of any pending actions.

III.B.9 Sites Requiring a Property-Specific Determination

The City of Girard affirms that the former Ohio Leatherworks property does not require a site-specific determination.

III.B.10 Threshold Criteria Related to CERCLA/Petroleum Liability

III.B.10.a Property Ownership Eligibility - Hazardous Substance Sites

III.B.10.a.i Exemptions to CERCLA Liability

III.B.10.a.i.1 Indian Tribes

III.B.10.a.i.2 Alaska Native Village Corporations and Alaska Native Regional Corporations

III.B.10.a.i.3 Property Acquired Under Certain Circumstances by Units of State and Local Government

The City of Girard acquired the Property through judicial proceedings of the Ohio attorney general's office, which allowed the City to take ownership on April 30, 2014 with a Quit Claim Deed. All disposal of hazardous substances at the site occurred before the City acquired the Property. The City of Girard has not caused or contributed to any release of hazardous substances at the site. The City of Girard has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

III.B.10.a.ii. Exceptions to Meeting the Requirement for Asserting an Affirmative Defense to CERCLA Liability

III.B.10.a.ii.1 Publicly Owned Brownfield Sites Acquired Prior to January 11,2002

III.B.10.a.iii Landowner Protections from CERCLA Liability

III.B.10.a.iii.1 Bona Fide Prospective Purchaser Liability Protection

III.B.10.a.iii.1.a Information on the Property Acquisition

The City is the sole owner of a fee simple interest in the property which it acquired on April 10, 2014 by quit-claim deed from Navy Friends Inc., a Virginia corporation, as recorded at Instrument No.201404300008787 Trumbull County Records. The City did/does not have an affiliated interest with any of the prior owner(s), or operator(s), or other potentially responsible parties.

III.B.10.a.iii.1.b Pre-Purchase Inquiry

Turn-Key Environmental Consultants, Inc. (TKEC) conducted a Phase I ESA of seven parcels of land formerly occupied by the former Ohio Leatherworks, report dated September 23, 2013. TKEC also completed a Phase I Environmental Site Assessment (ESA) Update of the same property, finalized Apr. 17, 2014.

TKEC was authorized by the Ohio Environmental Protection Agency (EPA), Division of Environmental Response and Revitalization (DERR) to conduct this assessment and the TKEC personnel performing the work met the definition of Environmental Professional under 40CFR Part 312.

Specific activities conducted were in conformance with the scope and limitations of the EPAs Standards and Practices for All Appropriate Inquiries (AAI) - 40 CFR Part 312, the American

Society for Testing and Materials (ASTM) E1527-13 "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process. The September 2013 Phase I ESA had been conducted in accordance with ASTM E1527-05, which was the current standard at the time; and it had also been conducted in accordance with the Ohio Voluntary Action Program (VAP) guidelines for conducting Phase I Property Assessments (OAC 3745-300-06). This Phase I ESA Update in combination with the September 2013 Phase I ESA meets the requirements of the newer standard, ASTM E1527-13, as well as the AAI standard.

The April 2014 Phase I ESA Update did not reveal any Recognized Environmental Conditions (RECs) other than those identified by the September 2013 Phase I ESA.

III.B.10.a.iii.1.c Timing and/or Contribution Toward Hazardous Substances Disposal

All disposal and release of hazardous substances on the former Ohio Leatherworks property occurred prior to the property's acquisition by the City of Girard, and the city did not at any time contribute to the contamination at the site. The City affirms that it has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

III.B.10.a.iii.1.d Post-Acquisition Uses

The former Ohio Leatherworks property has been vacant and unused for many years prior to and since the City's acquisition; the only post-acquisition use by the City of Girard is temporary periodic storage of asphalt materials by the city's street department.

III.B.10.a.iii.1.e Continuing Obligations

The City of Girard conducted all appropriate inquiries prior to acquiring the former Ohio Leatherworks property in order to understand any imminent threat to the safety of the public. In subsequent years, the City limited access by maintaining the perimeter fence around the property, and by posting "No Trespassing" signs.

The City of Girard affirms its commitment to: comply with any land-use restrictions and not impede the effectiveness or integrity of any institutional controls; assist and cooperate with those performing the cleanup and provide access to the property; comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and provide all legally required notices.

III.B.10.a.iii.2 Non-Publicly Owned Sites Acquired Before January 11, 2002

III.B.10.b Property Ownership Eligibility - Petroleum Sites

III.B.10.b.i Information Required for a Petroleum Site Eligibility Determination

Does Not Apply.

III.B.10.b.i.1 Current and Immediate Past Owners

III.B.10.b.i.3 No Responsible Party for the Site

III.B.10.b.i.2 Acquisition of Site

III.B.10.b.i.4 Cleaned Up by a Person Not Potentially Liable

III.B.10.b.i.5 Judgments, Orders, or Third Party Suits

III.B.10.b.i.6 Subject to RCRA

III.B.10.b.i.7 Financial Viability of Responsible Parties

III.B.11 Cleanup Authority and Oversight Structure

III.B.11.a Cleanup Oversight

The City of Girard intends to enroll in the Ohio EPA Voluntary Action Program (VAP) MOA Track.

The City has also secured, through a competitive Request for Qualifications (RFQ) process, the services of a capable environmental firm with experienced VAP Certified Professionals to coordinate and complete cleanup activities as well as provide additional oversight. The RFQ process met the requirements of 2CFR 200.317 through 200.326.

III.B.11.b Access to Adjacent Properties

Based on the proposed Remedial Action Plan (RAP), no adjacent property access will be required for cleanup or monitoring activities. All grant activity will be contained to the property boundaries.

III.B.12 Community Notification

III.B.12.a Draft Analysis of Brownfields Cleanup Alternatives

The attached draft Analysis of Brownfield Cleanup Alternatives (ABCA) discusses alternatives to mitigating and remediating the onsite contaminants including lead, antimony, arsenic, PCBs (below 50ppm), mercury and total petroleum hydrocarbons. Acceptable remedies under Ohio laws and Ohio EPA Voluntary Action Program (VAP) rules include combinations of source removal, in-situ treatment, institutional controls (e.g., land uses restriction), and engineering controls. Cost and implementation comparisons are included. A minimum of a local newspaper ad, fliers, and the city website alerted the citizens to the publicly available draft ABCA and public meeting.

III.B.12.b Community Notification Ad

A community notice for the Nov. 12th Public Meeting ran in the Warren Tribune Chronicle on Oct. 29, 2019, including meeting information, instructions for access to draft application and ABCA documents, and contact information, as attached.

Additionally, the project team passed out approximately 600 flyers containing similar information, as attached within public meeting minutes, to Girard residents at a Girard High School football game on Friday, Oct. 25th.

The project staff further emailed the above project notice to all Girard businesses listed in the Youngstown/Warren Regional Chamber's business database, a list of over 200 companies and contacts, and an additional list of 60+ business contacts compiled by city councilwoman Lily Martuccio.

III.B.12.c Public Meeting

A public meeting was held on Tuesday, Nov. 12, 2019, at Girard City Hall. During the meeting, the project team presented an overview of the site, project goals, redevelopment plans, application timeline, and other relevant details. The draft application and ABCA were available for review and the project team answered several questions about the project. Support materials are attached.

III.B.12.d Submission of Community Notification Documents

The following documents are attached:

- a copy of the draft ABCA(s);
- a copy of the ad, which ran in the Warren Tribune Chronicle on Oct. 29, 2019;
- a summary of the comments received;
- the project director's response to those public comments;
- meeting notes or summary from the public meeting occurring Nov. 12th, 2019;
- meeting sign-in sheets from the public meeting occurring Nov. 12th, 2019;

III.B.13 Statutory Cost Share

III.B.13.a Meet Required Cost Share

Girard City Council has allocated \$100,000 from the city's general fund to meet the project's required cost share.

III.B.13.b Hardship Waiver

Not applicable.

A RESOLUTION AUTHORIZING THE MAYOR TO APPLY FOR FEDERAL AND STATE GRANTS FOR BROWNFIELD REMEDIATION AND ALLOCATING MATCHING FUNDS AND DECLARING AN EMERGENCY

WHEREAS, the City of Girard owns public lands, formerly known as the "Leatherworks Property," which are subject to brownfield remediation; and

WHEREAS, State and Federal grants are available to assist with the funding of brownfield remediation; and

WHEREAS, said grants may require matching funds from the City;

WHEREAS, City Council desires to commit city funds for said purposes.

NOW, THEREFORE BE IT RESOLVED by the City Council of the City of Girard, Ohio:

SECTION 1: The City Council of the City of Girard, Ohio hereby allocates and dedicates up to One Hundred Thousand and no/100 Dollars (\$100,000.00) for providing matching funds for the application of State and Federal brownfield remediation grants. Furthermore, the Mayor is hereby authorized and directed to apply for State and Federal grants for the brownfield remediation of City property.

SECTION 2: All formal actions of the City Council of Girard, Ohio relating to the adoption of this Resolution, and all deliberations of the City Council of Girard, Ohio and any of its committees leading to such action, were in meetings open to the public as required by law.


SECTION 3: That this Resolution is hereby declared to be an emergency measure necessary for the immediate preservation of the public peace, health and welfare, and for the further reason that said grants need to be administered and awarded without delay, as such, this Resolution shall take effect immediately upon its passage and approval by the Mayor, or in the alternative, from and after the earliest time permitted by law.

PASSED IN COUNCIL THIS 15th DAY OF November, 2019.

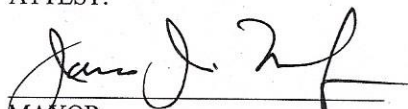

PRESIDENT OF COUNCIL

For Rec
RAGOZIN
STANDOI
WILSON
GRUMLE
MARTUC
MOLITER
RYSER
Schub
Passie

ATTEST:


CLERK

ATTEST:


MAYOR

APPROVAL DATE: 11-15-19
FIRST READING: 11-12-19
SECOND READING: 11-14-19
THIRD READING: 11-15-19

MOTIONED BY: Moliter
SECONDED BY: Martucci
DATE: 11-15-19

I hereby certify that the foregoing Ordinance was published in the Trumbull County Legal News on the dates hereinbelow set forth and was posted on the Girard City Bulletin Board on the day hereinbelow set forth.

DATES OF PUBLICATION:
26th DAY OF November, 2019
3rd DAY OF December, 2019

POSTED:
16th DAY OF November, 2019

THIS INSTRUMENT PREPARED BY:


CLERK OF COUNCIL


BRIAN KREN, LAW DIRECTOR



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Suite 106
Akron, Ohio 44333

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DRAFT

Analysis of Brownfield Cleanup Alternatives (ABCA)

**Former Leatherworks Site
Girard, Trumbull County, Ohio**

October 25, 2019

Introduction and Background

The purpose of this ABCA is to document the remediation activities and the alternate remedial strategies that were considered for an approximately 11.8-acre portion of the former Leatherworks site located at 1052 North State Street in the City of Girard, Trumbull County, Ohio. The site straddles Squaw Creek and is adjacent to the Mahoning River (separated only by a transportation corridor consisting of the Youngstown Beltway Co. Railroad - formerly Conrail R.R.). The Property is situated on formerly industrial land within a mixed-use residential, commercial, and industrial area of Girard (see attached *Site Location Map*)

According to historical records and facility maps, the subject Property was owned by the Ohio Leather Company from approximately 1902 through 1972. The Ohio Leather Company produced finished leather from animal hides with processes including washing, fleshing, depilation, bating, tanning, dying, and tempering. Many chemicals were used during the tanning process including sodium sulfide and chloride, lime, ammonia salts, sulfuric acid, chromium sulfate, and mercury. From approximately 1974 through 1994, the site was owned by D.L & S.G. Realty (aka Berk Realty) and was used for material storage, including titanium metal shavings, used grinding wheels, 55-gallon drums, and totes of high pH solids. Various companies owned by Berk Realty operated on and/or utilized the Property during this time period. The property has been vacant and unused since 1994. A large fire destroyed the remaining large building on the site in 1995.

Currently, the main southern parcel contains a small gatehouse, concrete pump house, several pits, building foundations, brick and demolition debris pile, and two concrete reservoirs filled

with soil, vegetation, and demolition debris. The northern portion of the Property is located north of Squaw Creek and contains two former lagoons partially filled with seasonal storm runoff water, a small amount of tires, and discarded debris. Also, on this portion of the property is a concrete “clarifier” reservoir filled with water, some concrete foundations, and a small water treatment plant consisting of several open-topped concrete vaults and piping. Although not considered for remedy or No Further Action (NFA) status under the current Remedial Action Plan (RAP), the western triangular portion of the former Leatherworks operation – located between the railroad tracks – is vacant and almost entirely wooded. Evidence of a former drum disposal area, a burn pile, and disposal of animal hides has been found scattered throughout this triangular offsite area consisting of approximately 2.2 acres.

The former Leatherworks industrial facility has been the subject of the multiple environmental assessments and some removal actions. The following summaries of assessment work conducted by regulatory agencies (i.e., Ohio EPA and USEPA) are copied from a 2007 draft of Findings and Orders prepared for the site by the Ohio EPA. In addition, summaries of previous Phase I and Phase II assessment work completed by environmental consultants/contractors on the property are provided in the following:

USEPA Removal Response Program Site Assessment (Tetra Tech EM Inc. June 5, 2001) – Shallow soil samples were collected and the results showed elevated levels of chromium and lead, particularly in the waste water treatment area. Other contaminants included carbon disulfide, cadmium, and mercury.

Former Ohio Leather Company Property VAP Phase I ESA (McCabe Engineering & Contracting – October 2003) - This Phase I assessment designated 13 Identified Areas (IAs) in accordance with the Voluntary Action Program. Several of the IAs were rather broad in scope (e.g., IA-2 – Adjacent Tributaries; IA-7 Below Grade Concerns; and IA-13 Groundwater). Further Phase II assessment under the VAP was indicated to refine the scope of the IAs and to evaluate the nature and extent of contamination within the designated areas.

Preliminary Assessment/Site Inspection (Ohio EPA – 2004) - The sediment samples from the clarifier contained high levels of chromium at 218 mg/kg and lead at 5,110 mg/kg. Chromium and lead in analyzed soil samples reached 24,900 mg/kg and 83,500 mg/kg, respectively. Ground water samples collected also showed elevated metals, including lead (791 µg/L), nickel (603 µg/L), chromium (264 µg/L), and arsenic (815 µg/L). A number of soil and sediment samples (collected from the catch basins) contained high concentrations of polycyclic aromatic hydrocarbons (PAHs). Sample results for benzo(a)pyrene from the catch basin sediments ranged from 880 to 7,100 µg/L.

USEPA (2004) - Conducted sampling in an area of the Site where Ohio EPA had previously found approximately 300 abandoned drums.

USEPA (2005) - Conducted additional sampling of the clarifier and lagoon areas of the Site and directed Site owner, Navy Friends, to remove drums and associated contaminated soil.

Expanded Site Inspection (USEPA - 2005) - Additional soil samples were collected and the results indicated benzo(a)pyrene concentrations up to 37,000 ppb, aroclor-1245 up to 8,900 ppb, and various metals, including chromium, lead, and zinc.

Navy Friends (Site owner) retained McCabe Engineering & Contracting (2006) - Drums and some contaminated soil removed from the site.

Phase I Environmental Site Assessment (Turn-Key Environmental, Inc. – September 23, 2013) - This Phase I assessment designated eight Identified Areas under the VAP. Like the previous Phase I, the IAs were rather broadly defined, but covered the same general areas of suspected and/or known areas of contamination resulting from prior site operations. The Phase I report recommended Phase II assessment to further investigate the nature and extent of potential environmental impact within the Identified Areas.

State of Ohio v. Navy Friend, Inc. (Consent Decree – March 25, 2014) – Signed Consent Decree satisfying civil liability to the State for all claims in the State’s Complaint related to costs incurred under CERCLA.

Biological Water Quality Assessment of the Mahoning River and Squaw Creek (Ohio Leatherworks Property) - (Midwest Biodiversity Institute - December 31, 2015) - Previous biological surveys by Ohio EPA in 1980, 1994, and 2006 revealed severely degraded conditions that reflected toxic impacts from both industrial and municipal point sources. While substantial improvements in the quality of the biological assemblages following reductions in pollutant loadings from these sources was documented in 1994 and 2006, impairment of the Warmwater Habitat (WWH) aquatic life use remained in 2015. As such, the Mahoning River is a recovering aquatic ecosystem that has demonstrated the capacity to respond positively to remedial efforts. Squaw Creek was impaired at the upstream site in 2015, due in part to a sewer line failure, but fully attained WWH at the mouth and on the Ohio Leatherworks property. Both heavy metal and organic compounds in sediments exceeded one or more screening levels in the Mahoning River and Squaw Creek in 2015.

The results of the 2015 study revealed yet further improvements in the overall condition of the biological assemblages which validates past efforts to abate the serious pollution and severe impairment that was evident in the 1980 and 1994 Ohio EPA assessments. However, impairment of the WWH use remained at 3 of the 5 sites assessed in 2015. Partial attainment of the WWH aquatic life use was documented at the upstream-most 2015 site (River Mile [RM]

26.2), which is impacted by past and present-day industrial and municipal sources between Warren and Girard.

Pre-Remedial VAP Phase II Property Assessment - Former Ohio Leatherworks Property (Brownfield Restoration Group, LLC – April 12, 2016) - Brownfield Restoration Group, LLC (BRG) performed a Phase II Property Assessment (Phase II) pursuant to the Ohio EPA Voluntary Action Program (VAP) rule at the site beginning in February 2015 and prepared a Phase II Property Assessment report dated April 12, 2016. Funding for this assessment work was received by the Western Reserve Port Authority through a Brownfield Coalition Assessment Grant administered by the U.S. Environmental Protection Agency (USEPA). Phase II activities were conducted in accordance with the USEPA-approved Property-specific Sampling and Analysis Plan (SAP) and Quality Assurance Protection Plan (QAPP) for work completed under the Brownfield assessment grant.

The following ten VAP Identified Areas (IAs) were designated for Phase II investigation under the VAP. These IAs were defined based on a review of previous assessment work, including two previous VAP Phase I assessments. The IAs designated below were targeted based on findings of previous work and cover the previously indicated areas of environmental concern [Note: the McCabe Phase I (2003) designated 13 separate IAs, but also encompassed 27 acres compared to the 11.8 acres that comprise the subsection of the site currently targeted for remediation.]

| Identified Area | Description | Source of Determination |
|-----------------|--|--|
| IA-1 | Historical Use for Leather Tanning Operations and Metal Storage/Disposal | Historical land use review |
| IA-2 | Titanium Shavings/ Drum Accumulation Area 1 (79 drums west of Bldg. 8 & 9) | Historical land use review |
| IA-3 | Drum Accumulation Area 2 (30 drums between reservoirs) | Historical land use review |
| IA-4 | Drum Accumulation Area 3 (30 drums south of Bldg. 25) | Historical land use review |
| IA-5 | Rail Spur | Historical land use review |
| IA-6 | Transformer House and Engine Room | Historical land use review |
| IA-7 | Oil/Gas Well | Historical land use review – site inspection |
| IA-8 | Historical Use for Wastewater Treatment Plant | Historical land use review |
| IA-9 | Three Wastewater Treatment Lagoons | Historical land use review – site inspection |
| IA-10 | Disposal of Coal-related Waste | Historical land use review |

Soil sample analyses from the IAs demonstrated that VAP direct-contact standards for commercial/industrial (C/I) land use were exceeded at several areas of the Property. IAs and soil sampling locations are shown on the attached *Identified Area Location Map* and *Sampling Location Map*, respectively. The chemicals of concern (COCs) that were found to exceed applicable C/I direct-contact standards include antimony, arsenic, lead, mercury, PCBs, and total petroleum hydrocarbons (TPH). The most prevalent of these COCs was lead, with the other COCs being identified above applicable standards in relatively small and isolated areas. Soil results for lead exceed VAP Construction/Excavation (C/E) worker direct contact standards in one of the former lagoons. Additionally, sediments in the former lagoons also exceed several VOC, PAH, and metals screening standards for ecological receptors. Soil sampling locations exceeding VAP standards and requiring a remedy are identified on the attached map - *Areas of Property Subject to Proposed Soil Remediation*. Shallow ground water beneath the targeted property only slightly exceeds Unrestricted Potable Use Standards (UPUS) for arsenic at three ground water monitoring well locations (MW-1, MW-5, and MW-26) and for lead in one ground water monitoring well (MW-1).

Applicable Regulations and Cleanup Standards

The intended cleanup standards for this site are encompassed within Ohio EPA Voluntary Action Program (VAP). The previously conducted VAP Phase II Property Assessment (BRG - 2016) of environmental conditions at the site demonstrate that the predominant contaminant of concern is lead, although there are also areas impacted with TPH, PCBs, arsenic, mercury, and antimony found to exceed applicable soil standards. Potential exposure pathways are direct contact with soil, ground water ingestion, and impact to the ecological receptors in the adjacent Squaw Creek and Mahoning River. However, a simple ground water use restriction will block the ground water ingestion exposure pathway and the assessment data obtained from the site to date indicates that the onsite contamination is not impacting the adjacent surface water bodies.

The soil direct-contact standards are applied to the upper two feet of soil (point of compliance) in order to comply with VAP commercial/industrial land use. The VAP provides baseline standards that are generic, but also contains provisions for modifying generic standards based on actual environmental conditions and guidelines for performing site-specific risk assessment. Acceptable remedies under the VAP include various combinations of source removal, in-situ treatment, institutional controls (e.g., land use restrictions), and engineering controls. Assessment and remedial activities under the VAP must be overseen by an Ohio EPA Certified Professional.

Remedial actions must be implemented in the eight remediation areas (REMs) as shown on the attached figure – *Areas of Property Subject to Proposed Soil Remediation*. In order to achieve the stated purpose of the RAP, the following objectives must be met:

- The soil in the former Waste Water Treatment Plant lagoons (REM-1 and REM-2) exceeds VAP standards for sensitive ecological receptors and must be mitigated.
- Soil in the upper two feet on the Property must meet direct contact standards in accordance with Environmental Covenants restricting land use to Commercial/Industrial (C/I) worker activities.
- Soil within any portion of the site to be used for a trailhead as part of a bike/hike system, greenspace, and/or access to the Mahoning River must meet recreational use standards.
- Soil on the property must meet direct contact standards for Construction/Excavation (C/E) workers or otherwise address this exposure pathway.
- The ground water ingestion pathway on the Property must be eliminated. The data indicates that the ground water in the shallow aquifer exceeds UPUS at three locations on the Property but satisfies the VAP ground water response requirement that UPUS be met at the downgradient Property boundaries.

The proposed cleanup takes full advantage of the flexibility of the VAP to meet all applicable environmental laws and regulations, while maximizing protections of human health and the environment, and minimizing the overall cost. The preferred approach will combine source removal and replacement or placement of 2-feet of clean soil over areas impacted by metals and petroleum contamination in portions of the site; institute practical land use restrictions (e.g., mandate commercial/industrial land use over portions of the site and prohibit ground water use); and implement a Risk Mitigation Plan (RMP) to protect C/E workers from potentially impacted soil exceeding direct-contact standards.

This approach has been implemented at other local brownfields sites in the Mahoning valley area and has proven to be readily implemented, effective at meeting the remedial goals, and achieved within the proposed budget.

Evaluation of Cleanup Alternatives

Several remedial alternatives to address the contamination and facilitate re-use of this site were evaluated. A brief description of the alternatives considered, and the approximate associated costs are provided in the following summaries:

Take No Action - Although low cost and easy to implement, this alternative would not provide any positive effect toward reaching the remedial goal of achieving Ohio VAP re-use standards and obtaining No Further Action (NFA) status and a Covenant Not to Sue (CNS) from the State

of Ohio. Planned redevelopment would fail due to the site's regulatory status. The site would continue to be blighted and contribute to the health risk of the community.

Excavate and Dispose - This alternative would consist of the excavation and disposal of soil exceeding direct-contact standards in the upper two feet of soil in order to meet VAP commercial/industrial standards (REM-3 through REM-8) and ecological standards in the former lagoons (REM-1 and REM-2). Based on the Phase II assessment work completed to date, it is estimated that 8,015 tons of contaminated soil would be required to be removed from the site, disposed of at a properly licensed landfill, and replaced with clean fill. A significant benefit of this remedial approach is that the contaminated soil would no longer be available at the site to be a source of potential human health risk, environmental harm, or an impediment to future development plans. This alternative is readily implemented, effective, and reliable. However, it is costly and not achievable for the entire site within the project/grant budget. The estimated cost of removal, disposal, and replacement of 8,015 tons of non-hazardous soil at \$96.00 per ton is \$769,440. When ancillary costs such as site clearing, mobilization, permitting, etc. (\$37,000) as well as the oversight, reporting, and NFA preparation (\$120,000) costs are also included, the total cost of this alternative is approximately **\$926,440**.

In-situ Stabilization – Stabilization of heavy metals like lead is a proven technology and could be effective in chemically binding the metal so that it is no longer susceptible to leaching. This can also significantly lower disposal costs of lead-contaminated soil that fails leaching tests (TCLP) and is characteristically hazardous. Reduced leaching potential also lowers the risk of lead migration in the environment and exceeding standards for various exposure pathways in the future. However, stabilization does not lower the *total* lead concentration, which is the concentration that VAP standards are based on, so this remedial alternative by itself is not likely to be advantageous for this site. The amount of soil estimated to be primarily impacted by lead (Remediation Areas REM-5 and REM-6) equates to approximately 4,901 tons. If this entire soil area were to be determined to be impacted at hazardous levels, the cost of stabilizing this soil in place at \$150 per ton is \$735,150. When other related costs for oversight, reporting, and NFA preparation are considered, the cost of this alternative is approximately **\$892,150**.

Additionally, other metals (mercury, arsenic, antimony) as well as TPH and PCB contamination would remain in the soil with this alternative and would require further remedial actions, which would increase the cost of this alternative further still. This alternative is best considered as a partial remedial measure used in conjunction with other remedies in the event that a relatively small portion of the soil is found to be hazardous.

Clean Fill Barrier Placement - Direct contact standards for commercial/industrial and recreational land use incorporate a point-of-compliance that is comprised of the upper two feet of soil. An acceptable remedy for direct contact under the VAP is the placement of two or more feet of clean soil meeting the applicable direct contact standard. This approach is readily implemented, especially in lower lying areas that are likely to be subject to filling during site development anyway. A disadvantage is that the impacted soil will remain at the site beneath the clean fill barrier and is therefore available as a future source of potential human risk or environmental harm if the clean soil barrier is removed or altered during future development. The estimated cost of placement of two feet (8,015 tons) of clean soil over REM-1 through REM-8 at \$26.00 per ton is \$208,390. When ancillary costs (site clearing, mobilization, permitting, etc.) are factored into the cost and the oversight, reporting, and NFA preparation costs are also included, the total cost of this alternative is approximately \$365,390.

Engineering Controls – Blocking or severing exposure pathways through implementation of engineering controls (e.g., pavement or building floors) is a cost effective and proven approach. If site development plans include large paved areas, such as parking lots, this approach is readily implementable. The primary disadvantage is that the contaminated soil remains at the site and is therefore available as a future source of potential human risk or environmental harm if the engineering control is removed or altered during future site work. An operation and maintenance plan (an agreement with the Ohio EPA) is required to be established and continued in perpetuity under this alternative in order to ensure continued protectiveness. The estimated cost of installing 72,143 square foot of pavement engineering control in Remediation Areas REM-1 through REM-8 at \$5.00 per square foot is \$360,715. Including other related costs such as site clearing, mobilization, permitting, oversight, reporting, and NFA preparation increases the total cost of this alternative to approximately \$517,715.

Institutional Controls (Land Use Restrictions) – Land Use restrictions instituted via an Environmental Covenant with the Ohio EPA are a very cost effective and readily implemented means of addressing certain remediation issues. For example, a land use restriction prohibiting ground water use on the Property for potable purposes eliminates the ground water ingestion pathway. However, a land use restriction that would prevent potential contact with the lead-contaminated soil would need to restrict all access to that portion of the site and would render the Property unsuitable for most re-use purposes. The estimated cost of implementing institutional controls stringent enough to eliminate the known exposure pathways is estimated to cost \$120,000 including other related cost such as reporting and NFA preparation. This approach would likely render the site unusable for most redevelopment projects.

Climate Change Evaluation

The subject Property is adjacent to the Mahoning River and straddles Squaw Creek, therefore flood waters may be expected to some extent. However, in the event of more frequent flooding induced by climate change, each of the alternatives evaluated are anticipated to readily withstand the event. In the rare instance of flooding on the Property, the flow energy outside the banks of the river and creek is expected to be relatively low. As a result, deposition of creek sediments onto portions of the site is considered to be far more likely than scouring and displacement of the clean soil layer or engineering controls installed at the site.

Recommended Cleanup Alternative

The preferred remedial approach incorporates a combination of the above alternatives. Source removal via 'excavation and disposal' will be performed in Remediation Areas REM-3, REM-4, REM-6, REM-7, and REM-8. Placement of 2 to 4 feet of clean fill will be used to close the former lagoons (REM-1 and REM-2) and to block the direct-contact exposure pathway in REM-5. If an unexpectedly large amount of the contaminated soil in REM-3 through REM-8 is determined to be hazardous or if the contaminated soil volume exceeds the amount that can be cost-effectively removed and disposed, clean soil barrier placement and/or engineering controls will be implemented, as required, to complete the remedy. Institutional controls consisting of prohibiting ground water use and limiting specific portions of on-site land use to commercial/industrial activities will also be employed. This combination of alternatives will maximize the benefits of the remedial actions while maintaining good use of required resources (e.g., energy needed for remedial actions and prudent use of limited landfill space). Potential increased frequency of flooding related to climate change would have a minimal impact on this approach. As supported in the budget table for this project, the estimated total cost of the recommended cleanup is \$599,000.

Mayor James Melfi

The City of Girard, Ohio

Signed: _____

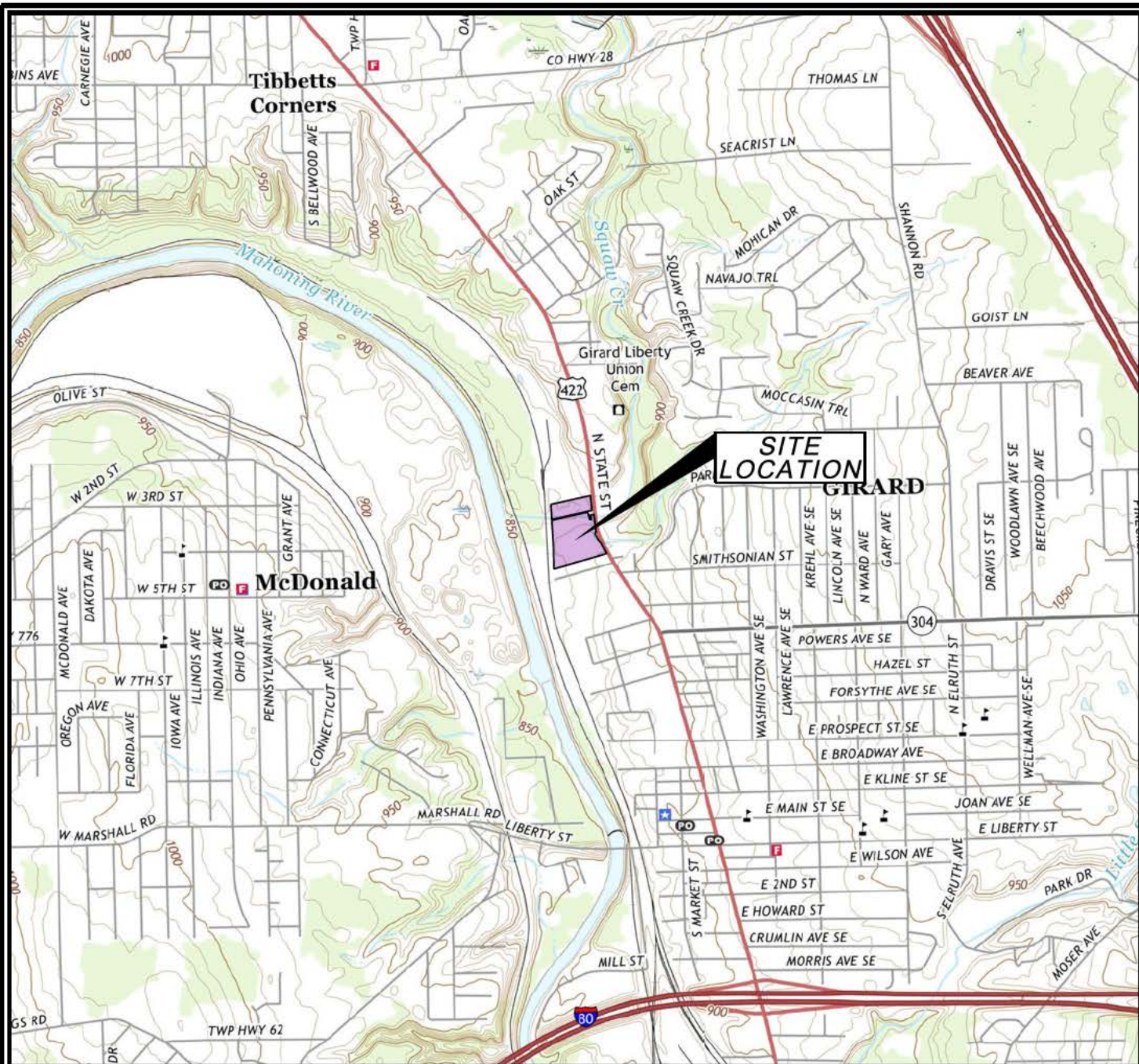
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Date: _____

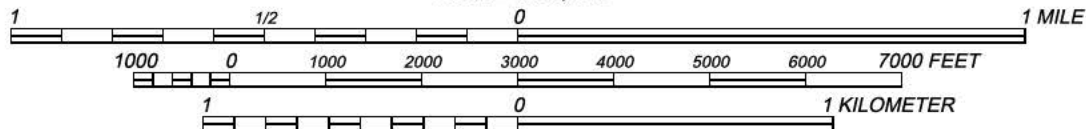
Attachments

- *Site Location Map*
- *Identified Area Location Map*
- *Sampling Location Map*
- *Areas of Property Subject to Proposed Soil Remediation*

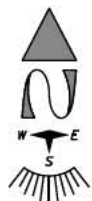
[This document prepared by Jim C. Smith (Ohio EPA Certified Professional No. 121) of Brownfield Restoration Group, LLC].



SCALE 1:24,000



CONTOUR INTERVAL 10 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1988



GEOGRAPHIC COORDINATE-
LATITUDE: N. 41° 09' 55.78"
LONGITUDE: W. 80° 42' 28.99"
HORIZONTAL DATUM: NAD83

USGS 7.5 MINUTE SERIES (TOPOGRAPHIC)
QUADRANGLE:

GIRARD, OHIO 2013



**BROWNFIELD
RESTORATION
GROUP, LLC**

1000 S. Cleveland-Massillon Rd.
Suite 106
Akron, OH 44333
Phone: (330) 668-4600
Fax (330) 668-8464

Site Location on U.S.G.S. Topographic Map

Former Leatherworks Property
1052 N. State Street, Girard, Ohio 44420

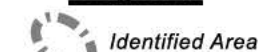
Prepared by: U.S.G.S. Date: January 2019 Project No. 10043



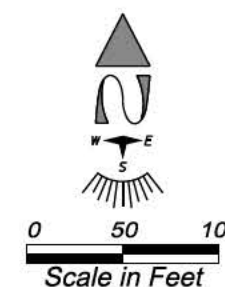
Identified Areas


- IA-1: Historical Use for Leather Tanning Operations and Metals Storage/Disposal
- IA-2: Titanium Shavings/Drum Accumulation Area #1 (79 drums west of bldg. 8 & 9)
- IA-3: Drum Accumulation Area #2 (30 drums between reservoirs)
- IA-4: Drum Accumulation Area #3 (30 drum south of bldg. 25)
- IA-5: Rail Spur
- IA-6: Former Transformer House and Engine Room
- IA-7: Oil/Gas Well
- IA-8: Historical Use for Waste Water Treatment Plant
- IA-9: Three Waste Water Treatment Lagoons
- IA-10: Disposal of Coal-related Waste

Legend



Identified Areas are interpreted from Figures 4A, 4B and 4C of a Phase I ESA by Turn-Key Environmental, Inc. dated September 23, 2013 and a Phase I ESA by McCabe Engineering dated October 2003. Locations are very approximate.

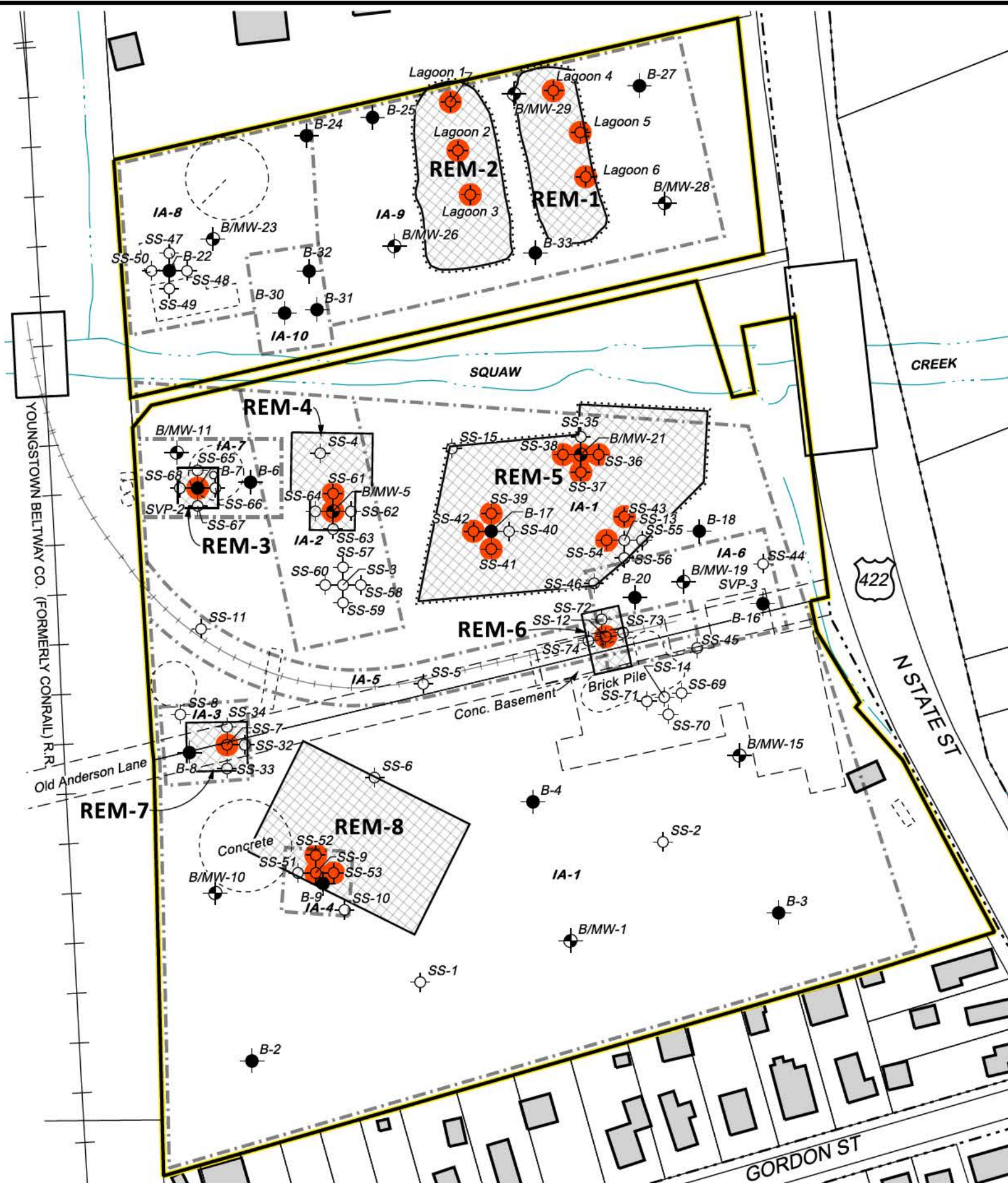


| | |
|--|---|
|  BROWNFIELD RESTORATION GROUP, LLC | 1000 S. Cleveland-Massillon Rd. Suite 106 Akron, OH 44333 |
| | Phone: (330) 668-4600 Fax (330) 668-8464 |

Identified Area Location Map

Former Leatherworks Property
1052 N. State Street, Girard, Ohio 44420

Prepared by: J. Kaufman | Date: January 2019 | Project No. 10043



Estimate of Quantities

SF x 2or4 = CF +27 = CY x 1.5 = Ton

| Area | Description | Sq. Ft. | Depth | Cu. Ft. | Cu. Yd. | Ton |
|--|---------------|---------|-------|---------|----------|----------|
| Subject to Two feet or Four feet of fill placement | | | | | | |
| REM-1 | East lagoon-* | 7,675 | 4' | 30,700 | 1,137.04 | 1,705.56 |
| REM-2 | West lagoon-* | 10,375 | 4' | 41,500 | 1,537.04 | 2,305.56 |
| REM-5 | Lead | 27,745 | 2' | 55,490 | 2,055.19 | 3,082.78 |

Subject to Soil Removal/Disposal/Replacement

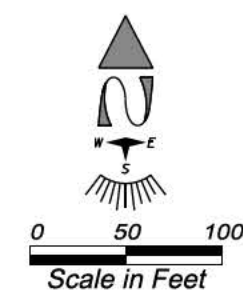
| | | | | | | |
|-------|-----------------|--------|----|--------|----------|----------|
| REM-3 | Mercury & TPH | 1,156 | 2' | 2,312 | 85.63 | 128.44 |
| REM-4 | PCBs | 4,628 | 2' | 9,256 | 342.81 | 514.22 |
| REM-6 | Arsenic | 2,081 | 2' | 4,162 | 154.15 | 231.22 |
| REM-7 | Antimony & Lead | 2,119 | 2' | 4,238 | 156.96 | 235.44 |
| REM-8 | Lead | 16,364 | 2' | 32,728 | 1,212.15 | 1,818.22 |

* Sediment exceeds ecological standards

Soil exceeds C/I direct contact soil standards

Legend

- Exceeds VAP Standards at 0-2' Depth
- Shallow Soil Sample (0-2')
- Soil Boring
- ⊕ Soil Boring/Monitoring Well
- × Soil Vapor Point
- Identified Area Boundary
- Proposed Soil Remediation Area: excavation/disposal
- Proposed Soil Remediation Area: clean fill placement



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 Suite 106
 Akron, OH 44333
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 Fax (330) 668-8464

Areas of Property Subject to Proposed Soil Remediation

Former Leatherworks Property
 1052 N. State Street, Girard, Ohio 44420

Prepared by: P. Kuonen | Date: January 2019 | Project No. 10043

Tribune-Chronicle Legal Ads Print Ad Proof

ADNo: 4449 Customer Number: L13004
 Customer Name: Company: GIRARD CITY
 Address: ATTN: AUDITING 100 WEST MAIN ST.
 City/St/Zip: GIRARD ,OH 44420
 Phone: (330) 545-3879 Solicitor: 153
 Category: 9000 Class: 9005 Rate: LE-0 Start: 10-29-2019 Stop: 10-29-2019
 Lines: 34 Inches: 3.29 Words: 186

 Credit Card: Expire:
 Order Number:
 Cost: 213.28 Extra Charges: .00 Adjustments: .00
 Payments: .00 Discount: .00
 Balance: 213.28

**NOTICE OF A PUBLIC MEETING
 REGARDING THE CITY OF GIRARD'S
 APPLICATION FOR FUNDING THROUGH
 THE FY20 USEPA BROWNFIELDS
 CLEANUP GRANT TO FUND THE
 REMEDIATION OF CONTAMINATED
 PARCELS LOCATED ON THE FORMER
 GIRARD LEATHERWORKS PROPERTY**

The City of Girard is applying for a U.S. EPA Brownfield Cleanup Grant focused on the former Leatherworks Property at 1052 N. State Street, Girard, Ohio. A Public Meeting will be held on Tuesday, November 12th, 2019 at 6:00 P.M. at the Girard City Council Chambers, also known as the Girard Municipal Courtroom, 2nd floor, 100 N. Market Street, Girard, Ohio 44420 to discuss the draft grant application and the draft Analysis of Brownfields Cleanup Alternatives (ABCA). The draft documents are available for public review at the Girard Administration Building, Mayor's Office, 1st Floor, 100 West Main Street, Girard, Ohio 44420 and online at <http://www.cityofgirard.com/>. Public participation is requested. Comments may be provided at the public meeting and via e-mail to gmartuccio@cityofgirard.com. For more information, contact Lauren Johnson at (330) 744-2131, ext.1216.

We hope to see you on November 12th!

Respectfully,
 James J. Melfi, Mayor
 City of Girard

#302-1T-October 29, 2019 #4449

PUBLIC MEETING – COMMENT SHEET

Grant Application: USEPA Cleanup Grant (FY20)

Property: Former Leatherworks Property, 1052 N. State Street, Girard, Trumbull Co. Ohio

Meeting Location: Girard City Council Chambers, also known as the Girard Municipal Courtroom, 2nd floor, 100 North Market Street, Girard, Ohio 44420

Date/Time: Tuesday, November 12th, 2019 @ 6 PM

| Comment | Name | Email | Phone Number |
|---|-----------------|-----------------------------|--------------|
| This project would enhance the economic development of the City of Girard | Lily Martuccio | lmartuccio@cityofgirard.com | 330 545 837 |
| THIS PROJECT IS CRUCIAL TO THE RECREATIONAL WELFARE OF OUR CITIZENS. | Mark M. Stashko | mstashko@neo.rr.com | 330 545-6252 |
| This site also sits on an entrance to our city. Its development and restoration is important. | John Mulford | | 330 717 1305 |
| Will this complete improve the future bike trail for the Girard county | Kerri Schubert | Non-responsive | 330 717 7237 |
| | | | |
| | | | |
| | | | |

| Comment | Name | Email | Phone Number |
|---|-------------|----------------|----------------|
| Who is lead agency? GIRARD? | Fran Wilson | Non-responsive | Non-responsive |
| How long will it take (approx) from start to finish? | " | " | " |
| Who will supply money if we find we don't have enough? New Grant? | " | " | " |
| Is EPA data complete? Who fixes if they find something else? | " | " | " |
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Response to Comment: City of Girard cleanup application for former Ohio Leatherworks

Lauren Johnson

Fri 11/22/2019 4:48 PM

To: [REDACTED]@hotmail.com <[REDACTED]@hotmail.com>

Cc: JodyKaufman@brgroupllc.com <JodyKaufman@brgroupllc.com>; Julie Green <PCGreen@co.trumbull.oh.us>; Mayor James Melfi - City of Girard (gmartuccio@cityofgirard.com) <gmartuccio@cityofgirard.com>; kschubert@cityofgirard.com <kschubert@cityofgirard.com>

Keith,

Re: City of Girard USEPA Grant Application for Cleanup of former Ohio Leatherworks property

Thank you for attending the Nov. 12th meeting at Girard City Hall regarding the City of Girard's planned application for the cleanup of the former Ohio Leatherworks property.

In response to your written question:

"Will this complete the future trail for Girard and the county?"

Answer:

While there are still decisions to be made about the trail's final alignment, this project would provide an important link for the City's proposed trail spur, which will be part of the Great Ohio Lake to River Greenway.

Please do not hesitate to reach out to me if you have further questions about the pending application. As a reminder, the draft RAP and draft ABCA are available for your review at cityofgirard.com.

Sincerely,

Lauren Johnson

Manager, 422 Project and Business Development

11 Central Square, Suite 1600 | Youngstown, OH 44503

Direct: (330) 744.2131, ext. 1216 | Mobile: (330) 774-9579

regionalchamber.com



Response to comment: City of Girard cleanup application for former Ohio Leatherworks

Lauren Johnson

Fri 11/22/2019 4:31 PM

To: [REDACTED]@aol.com <[REDACTED]@aol.com>

Cc: JodyKaufman@brgroupllc.com <JodyKaufman@brgroupllc.com>; Mayor James Melfi - City of Girard (gmartuccio@cityofgirard.com) <gmartuccio@cityofgirard.com>; Julie Green <PCGreen@co.trumbull.oh.us>

Fran,

Re: City of Girard USEPA Grant Application for Cleanup of former Ohio Leatherworks property

Thank you for attending the Nov. 12th meeting at Girard City Hall regarding the City of Girard's planned application for the cleanup of the former Ohio Leatherworks property.

In response to your written questions:

1. Who is the lead agency? Girard?

Answer: Yes, the City of Girard is the lead entity and applicant for this grant application and, if successful, the cleanup effort. The project team also includes representatives of the Trumbull County Planning Commission and Youngstown/Warren Regional Chamber.

2. How long will it take (approximately) from start to finish?

Answer: Cleanup activities will be completed within 36 months.

3. Who will supply money if we don't have enough? New grant? And

4. Is EPA data complete? Who fixes if they find something else?

Answer: The cost estimates for cleanup are based on detailed and comprehensive site assessment data and cost contingencies are built into the estimates, so we are reasonably confident that the available funding is sufficient. However, we cannot guarantee the final project cost and it is true that unanticipated discoveries could potentially exhaust allocated funding. Our (BRG's) experience has been that we have always been able to complete the remedial actions and achieve cleanup goals within the grant budgets allocated on previous brownfield projects. In a worst case, we may not be able to achieve the complete remediation of the entire site and would have to prioritize clean up areas to maximize the portion of the site remediated and the environmental benefit of the work performed.

Please do not hesitate to reach out to me if you have further questions about the pending application. As a reminder, the draft RAP and draft ABCA are available for your review at cityofgirard.com.

Sincerely,

Lauren Johnson

Manager, 422 Project and Business Development

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Direct: (330) 744.2131, ext. 1216 | Mobile: (330) 774-9579

regionalchamber.com

Response to Comment: City of Girard cleanup application for former Ohio Leatherworks

Lauren Johnson

Fri 11/22/2019 4:32 PM

To: John Moliterno <jmoliterno@westernreserveport.com>

Cc: JodyKaufman@brgroupllc.com <JodyKaufman@brgroupllc.com>; Julie Green <PCGreen@co.trumbull.oh.us>; Mayor James Melfi - City of Girard (gmartuccio@cityofgirard.com) <gmartuccio@cityofgirard.com>

John,

Re: City of Girard USEPA Grant Application for Cleanup of former Ohio Leatherworks property

Thank you for attending the Nov. 12th meeting at Girard City Hall regarding the City of Girard's planned application for the cleanup of the former Ohio Leatherworks property.

In response to your written comment:

"This site also sits on an entrance to our city. Its development and (illegible) are important."

Response:

Yes, development of the site will enhance the appearance of the city's primary economic corridor. Additionally, the project will provide new available property for future commercial/industrial development, as outlined in the comprehensive plan, which would lead to the creation of new jobs, added payroll, and increased tax revenue for the city and the county.

Please do not hesitate to reach out to me if you have further questions about the pending application. As a reminder, the draft RAP and draft ABCA are available for your review at cityofgirard.com.

Sincerely,

Lauren Johnson

Manager, 422 Project and Business Development

11 Central Square, Suite 1600 | Youngstown, OH 44503

Direct: (330) 744.2131, ext. 1216 | Mobile: (330) 774-9579

regionalchamber.com



Re: Response to Comment: City of Girard cleanup application for former Ohio Leatherworks

Mark Standohar <mstandohar@neo.rr.com>

Fri 11/22/2019 5:33 PM

To: Lauren Johnson <lauren@regionalchamber.com>

Thanks for your work on this project Lauren, have a great Thanksgiving!

— Mark

Sent from my iPhone

On Nov 22, 2019, at 4:33 PM, Lauren Johnson <lauren@regionalchamber.com> wrote:

Mark,

Re: City of Girard USEPA Grant Application for Cleanup of former Ohio Leatherworks property

Thank you for attending the Nov. 12th meeting at Girard City Hall regarding the City of Girard's planned application for the cleanup of the former Ohio Leatherworks property.

In response to your written comment:

"This project is crucial to the recreational wellbeing of our citizens."

Response:

Yes, the project will provide an important link to support the completion of the Girard Bikeway, a proposed spur of the Great Ohio Lake to River Greenway, which provides recreational opportunities to residents of northeast Ohio.

Please do not hesitate to reach out to me if you have further questions about the pending application. As a reminder, the draft RAP and draft ABCA are available for your review at cityofgirard.com.

Sincerely,

Lauren Johnson

Manager, 422 Project and Business Development

11 Central Square, Suite 1600 | Youngstown, OH 44503

Direct: (330) 744.2131, ext. 1216 | Mobile: (330) 774-9579

regionalchamber.com

[<image001.png>](#)

Response to Comment: City of Girard cleanup application for former Ohio Leatherworks

Lauren Johnson

Fri 11/22/2019 4:33 PM

To: Lily Martuccio (lmartuccio@cityofgirard.com) <lmartuccio@cityofgirard.com>

Cc: Mayor James Melfi - City of Girard (gmartuccio@cityofgirard.com) <gmartuccio@cityofgirard.com>;

JodyKaufman@brgroupplc.com <JodyKaufman@brgroupplc.com>; Julie Green <PCGreen@co.trumbull.oh.us>

Lily,

Re: City of Girard USEPA Grant Application for Cleanup of former Ohio Leatherworks property

Thank you for attending the Nov. 12th meeting at Girard City Hall regarding the City of Girard's planned application for the cleanup of the former Ohio Leatherworks property.

In response to your written comment:

"This project would enhance economic development in the city of Girard."

Response:

Yes, the project will provide new available property for future commercial/industrial development, as outlined in the comprehensive plan, which would lead to the creation of new jobs, added payroll, and increased tax revenue for the city and the county.

Please do not hesitate to reach out to me if you have further questions about the pending application. As a reminder, the draft RAP and draft ABCA are available for your review at cityofgirard.com.

Sincerely,

Lauren Johnson

Manager, 422 Project and Business Development

11 Central Square, Suite 1600 | Youngstown, OH 44503

Direct: (330) 744.2131, ext. 1216 | Mobile: (330) 774-9579

regionalchamber.com



MEETING SIGN-IN SHEET

Date /Time: Tuesday, November 12th, 2019 @ 6 P.M.

Subject: USEPA Cleanup Grant FY20 – Site Specific

Property: Former Leatherworks, 1052 N. State Street, Girard, Ohio 44420

| # | Printed Name | Representing | Email | Phone Number |
|----|--------------------------|-----------------------|------------------------------|--------------|
| 1 | Julie M. Green, Director | TCPC | pcgreen@co.trumbull.oh.us | 330-675-6620 |
| 2 | JOHN MOLTISANO | CRJ Council | | 330-545-5556 |
| 3 | Tribune Chronicle | Beth Shiller | | |
| 4 | Thomas J. Keiran | TCPC | pcKeiran@co.trumbull.oh.us | 330-675-2480 |
| 5 | Lily Martucci | Girard City Council | l.martucci@cityofgirard.org | |
| 6 | FRAN WILSON | GIRARD Council | Non-responsive | 330-545-2023 |
| 7 | Keith Schubert | GIRARD | | 330-717-7237 |
| 8 | Nicholas Caggins | TCPC | PC.Caggins@co.Trumbull.oh.us | 330-675-2713 |
| 9 | Jim Totu | | | |
| 10 | MARK M. STANDISH | COUNCIL GIRARD | MSTANDISH@NEO.RL.COM | 330-545-6252 |
| 11 | Jody Kaufman | Bremfield Restoration | jodykaufman@brc.org | 330-668-9600 |
| 12 | RENNY PAOLONE | GIRARD CITY | RENBREN128@Neo.RL.COM | 330-545-9808 |
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**FY20 USEPA Cleanup Grant
Former Ohio Leatherworks Site
Public Meeting Minutes
November 12, 2019**

A meeting to discuss the FY20 USEPA Clean up Grant for the former Ohio Leatherworks Site located at 1052 N. State Street, Girard, Ohio, in Trumbull County was held on Tuesday, November 12, 2019, at 6:00 p.m. at the Girard City Council Chambers, also known as the Girard Municipal Courtroom, 2nd floor, 100 North Market Street in Girard, Ohio.

Those in attendance included the following:

Julie Green, Trumbull County Planning Commission
John Moliterno, Girard City Council
Beth Shiller, Tribune Chronicle Reporter
Thomas J. Keiran, Trumbull County Planning Commission
Lily Martuccio, Girard City Council
Fran Wilson, Girard City Council
Keith Schubert, Girard City Council
Nicholas Coggins, Trumbull County Planning Commission
Jim Toth, Trumbull County Resident
Mark M. Standohar, Girard City Council
Jody Kaufman, Brownfield Restoration Group, LLC
Renny Paolone, Girard City Council President

Julie Green stated that the grant is due December 3, 2019, and she then opened the meeting by providing the history of the site known as the former Ohio Leatherworks. She stated that this site was once home to two different tannery operations, dating back to the 19th Century. She said that the former Ohio Leather Company was shuttered in the late 1960s and the property changed hands several times before fires in 1991 and 1995 destroyed nearly all the remaining structures. She stated that after extensive litigation, the City of Girard acquired the property in 2014. She said that two environmental assessments (Phases I & II) were completed for the property in 2016 and detailed the known environmental concerns. She said both assessments were completed by partners known as the Trumbull County Brownfield Coalition which included the Trumbull County Planning Commission.

She discussed other notable projects completed or in progress in proximity to the site:

Mahoning River Restoration Efforts – Being led and coordinated through the Eastgate Regional Council of Governments.

Little Squaw Creek Syro Sanitary Pump Station Improvements – Recently completed by the City of Girard which greatly reduces the threat of sewage overflow in the vicinity of Little Squaw Creek if the pump station would overflow. Improvements to the pump station greatly reduces the threat of overflow or failure and hence minimizes the threat of surface and groundwater contamination from occurring within the vicinity of Little Squaw Creek.

Project Overview Minutes
November 12, 2019
Page 2

Little Squaw Creek Phases I through 5 – Being worked on by the Trumbull County Sanitary Engineer's Office and they are currently on the last phase – the construction of sanitary sewers within the Consent Decree Area will serve to alleviate groundwater contamination and unsafe conditions stemming from failing home sewage treatment systems.

Canoe Livery Grant and Installation – ODNR grant with the City of Girard in 2017- Installed on the banks of the Mahoning River.

US422 Redevelopment Plan and Implementation – ongoing

Downtown Revitalization Grant – Julie Green and Lily Martuccio worked on this grant as part of the vision to revitalize US 422 Corridor and assisted over 35 businesses.

Abandoned Gas Station Clean Up Grant – removed a vacant, abandoned gas station on US 422 - project lead by Lauren Johnson and TNP.

Mr. Coggins then gave the following report on the Project Scope:

Activities will be completed by the Project Team: The City of Girard (Applicant, fiscal agent), the Youngstown/Warren Regional Chamber (reporting and redevelopment) the Trumbull County Planning Commission (reporting, administration, community outreach, mapping), and Brownfield Restoration Group, LLC (environmental work, monitoring, and reporting to applicable standards). Environmental task are as follows:

Task 1: Project Management & Coordination - The Environmental Professional will manage the remedial project tasks and coordinate with Project Team members, the USEPA Project Manager and the Ohio EPA VAP site coordinator. Land survey work will be performed under this task to support remediation and the legal description in support of the engineering controls and institutional controls. A Quality Assurance Plan (QAPP) for hazardous substances cleanup of lead, arsenic, antimony, PCBs (under 50 ppm) and co-mingled mercury and total petroleum hydrocarbons will be developed. Following the public comment/response period, the final ABCA document and a Remediation Contractor scope of work for competitive bid will also be completed under this task.

Task 2: Remedial Actions - The Soil Remediation Contractor work will generally consist of the excavation, transportation, and disposal of contaminated soil and the replacement with clean soil under the direction of the Environmental Professional. The Environmental Professional will direct and document the excavation activities to be performed by the Remediation Contractor. The soil Remediation Contractor will be responsible for providing all labor, material, equipment, and any permits that may be required to perform the following elements of work:

Project Overview Minutes

November 12, 2019

Page 3

- Prepare and implement a site-specific Health & Safety Plan. The soil Remediation Contractor will be responsible for the health and safety of its workers and for securing the work site with respect to health and safety matters (e.g., providing a security fence and warning signs around all open excavations).
- Obtain the necessary permits for this project.
- Properly characterize (waste profile), and manifests for the excavated material for disposal.
- Remedial work in Remediation Areas 1 and 2 (East & West Lagoon Closures, Remove Clarifier-Water AST)
- Remedial Area 3 (Non-hazardous mercury and incidental TPH)
- Remedial Area 4 (Non-hazardous PCBs)
- Remedial Area 5 (Non-hazardous lead)
- Remedial Area 6 (Non-hazardous arsenic)
- Remedial Area 7 (Non-hazardous antimony and lead)
- Remedial Area 8 (Non-hazardous lead)

Task 3: Confirmatory Sampling - The Environmental Professional will obtain samples for analysis of chemicals of concern along the proposed excavation to confirm that the contamination perimeter meets the appropriate VAP standards (e.g., 800 mg/kg limit for lead within a depth of 0-2 feet). Waste characterization sampling and analysis for toxicity characteristic leaching procedure (TCLP) of soil for disposal must be conducted so that live loading can occur. If waste characterization sampling profiles the on-site contaminated soil as hazardous waste, the soil must be stabilized within the footprint of the contaminated area prior to removal and disposal at a properly licensed Subtitle D landfill. The Environmental Professional will perform aquifer sampling and testing prior to abandoning the project monitoring wells. Following the receipt of laboratory analytical and final affidavits, the project monitoring wells will be properly abandoned based on local, state, and federal guidelines.

Task 4: Risk Assessment/Modeling - The Environmental Professional will complete a Risk Assessment for the Property to incorporate a Multiple Chemical Adjustment (MCA) into generic VAP standards based on the final residual levels of contaminants in accordance with the Ohio EPA VAP rules. Ground water modeling and contaminant fate and transport modeling will be performed to demonstrate that residual contaminant levels will not adversely impact human health or ecological receptors at the adjacent Squaw Creek and/or Mahoning River.

Task 5: Risk Mitigation Plan - Soil in some portions of the Property within and below the 0 to 2 foot commercial/industrial point of compliance exceeds generic standards applicable to construction/excavation worker exposures. The Environmental Professional will complete a Risk Mitigation Plan (RMP) which will protect workers in the event that future subsurface construction activities encounter contaminated soils. The RMP will also provide guidelines for properly managing contaminated media that may be encountered during construction activities and requirements for restoring any breaches of the point of compliance on the Property. The Environmental Professional will complete an Operation & Maintenance Plan (O&M) in

Project Overview Minutes
November 12, 2019
Page 4

accordance with Ohio EPA VAP rules for engineering controls implemented on any portion of the Property.

Task 6: Remediation Report Preparation & Phase I Update -The Environmental Professional will complete a Remediation Report to summarize the remedial actions implemented on this project.

The Phase I report will also be updated in accordance with VAP rules which stipulate that a Phase I report must be completed or updated within 180 days of submittal of a No Further Action (NFA).

Task 7: NFA Document Preparation - This task will also entail the preparation of the NFA document as well as follow up responses to comments from the Ohio EPA review of the NFA.

Julie Green distributed sheets for comments and contact information from those in attendance, and she stated that this is part of an on-going evaluation to revitalize this site which was mentioned in the 2003 Brownfields Inventory, the 2009 Mahoning River Corridor Initiative Feasibility Study, the 2017 City of Girard Comprehensive Plan and the 2019 Eastgate Regional Council of Governments Dam Removal Initiative; part of the overall Mahoning River Restoration Effort.

Councilwoman Lily Martuccio gave the following reports on the outreach activities:

She said that she has attended several of the City's Block Watch meetings. The first was held on September 11, 2019, at the Girard Multi-Generational Center and Lauren Johnson presented the project to those in attendance and discussed the studies that have been completed and the project that is being discussed tonight and what it entails. She stated that the proposed reuse for the site is commercial and recreational development. In addition, almost 700 flyers were distributed at a Girard Football game on October 25th by local volunteers and over 1700 flyers were sent home with all Girard high school students on Oct. 25, 2019, by the Girard School District. The flyer is attached.

Julie Green also stated that consideration for part of the property will be made for recreation/bike trails as presented to the City of Girard a few years ago. The trail is also planned to tie into the Great Ohio Lake-to-River Greenway trail. Ms. Martuccio said that the Great Ohio Lake-to-River Greenway Coalition has dedicated funds set aside for the Girard Bike Trail.

Ms. Martuccio continued by stating that the second meeting was held September 19, 2019, at the Girard Free Library, and TJ Keiran from the Planning Commission gave a presentation on this project. There were questions and comments from those in attendance, and they thought it was an important project and were very supportive of it.

Julie Green introduced TJ Keiran from the Trumbull County Planning Commission and stated that he prepared the maps of the project area.

Project Overview Minutes
November 12, 2019
Page 5

Mrs. Green then discussed the application process, amount requested, and grant timeline if successful. She said that the expected timeline was to submit grant application on or before the deadline of December 3, 2019 and that Girard is requesting \$500,000 matched with \$100,000 in local funds. Grant announcements are expected in April/May 2020 and, if awarded, work activities will begin late summer-early fall.

Julie Green stated that the project partners and their duties are:

City of Girard (Applicant, fiscal agent)

Youngstown-Warren Regional Chamber (reporting and redevelopment)

Trumbull County Planning Commission (reporting, administration, community outreach, mapping)

Brownfield Restoration Group, LLC (environmental work, monitoring, and reporting to applicable standards)

Julie Green stated they are working with a great resource called TAB EZ which gives Technical Assistance to Brownfields through the Kansas State University Program. She said that the first draft was submitted and experts have reviewed and sent their evaluations, pointers and tips. She said the second draft will be submitted soon.

Julie Green stated that future plans for the reuse of the site have been discussed with the project partners and with Girard City residents through their recently adopted Comprehensive Plan. She stated that it is worth noting that the site is located in a federally designated Opportunity Zone.

Mrs. Green asked for questions, and to leave any comments on the comment sheet.

Questions:

Fran Wilson of the City of Girard Council asked if we get extra points on the application for anything? Julie Green stated that we do get points for the site being located in an Opportunity Zone; Census Tract 9339 and TJ Keiran stated that extra points are assigned for using alternative energy credits.

Mr. Coggins stated that the Comprehensive Plan that was completed for the City of Girard in 2017 mentioned parks and bike trails as a goal for the city, and this project will help to complete this goal. He stated you will be able to ride to the lake or the river from the City of Girard once trails are completed.

Mr. Moliterno asked if there was some way to have a Welcome to Girard Sign and a pedestrian bridge constructed across US 422 connecting the site and proposed bike trail to Tod Park.

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November 12, 2019
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Jody Kaufman from the Brownfield Restoration (who arrived late to the meeting because of an accident on the highway) asked if anyone has questions about the environmental aspects of the project. Julie Green explained that a comment sheet is going around the room.

There being no further comments, the meeting was adjourned at 6:25 p.m.

mas

NOTE: A news article was published the day following the public meeting and is also attached herein. Also attached are the written comment sheets and answers to questions, photos of the public meeting, sign-in sheet, agenda, speaker notes, maps and proof of publication online and in local newspaper.

**FY20 USEPA CLEAN UP GRANT
GIRARD LEATHERWORKS SITE
Project Overview Agenda**
Tuesday, November 12th, 2019 @ 6 PM

Site history

The site known today as the “Girard Leatherworks,” was once home to two different tannery operations, dating back to the 19th century. Ohio Leather was shuttered in the late 1960s and the property changed hands several times before fires in 1991 and 1995 destroyed nearly all the remaining structures. After extensive litigation, the city of Girard acquired the property in 2014. Two environmental assessments (phase I & II) were completed for the property in 2016 and detail the known environmental concerns.

Other notable projects completed or in progress in proximity to Site

Mahoning River Restoration Efforts
Little Squaw Creek Pump Station Improvements
Little Squaw Creek Phases I through 5
Canoe Livery Grant and Installation
US422 Redevelopment Plan and Implementation
Downtown Revitalization Grant
Gas Station Clean Up Grant

Project scope

Task 1: Project Management & Coordination
Task 2: Remedial Actions
Task 3: Confirmatory Sampling
Task 4: Risk Assessment/Modeling
Task 5: Risk Mitigation Plan
Task 6: Remediation Report Preparation & Phase I Update
Task 7: NFA Document Preparation

Application process, amount requested, and grant timeline if successful

Expected timeline: Submit grant application on or before deadline of December 3, 2019, requesting \$500,000 matched with \$100,000 in local funds, grant announcements in April/May 2020, if awarded, work activities begin late summer-early fall

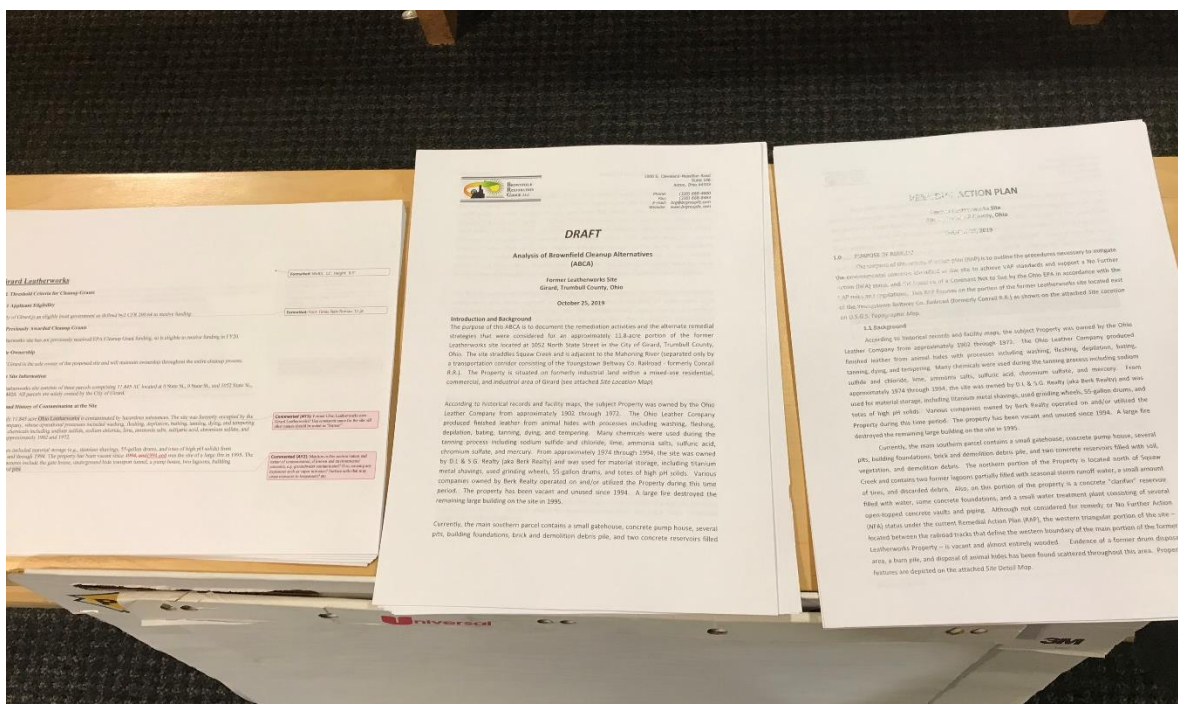
Project partners

City of Girard (Applicant, fiscal agent)
Youngstown-Warren Regional Chamber (reporting and redevelopment)
Trumbull County Planning Commission (reporting, administration, community outreach, mapping)
Brownfield Restoration Group, LLC (environmental work, monitoring, and reporting to applicable standards)

Future plans for site redevelopment



The maps pictured above were displayed during the Nov. 12, 2019 public meeting.



The Application draft, Draft ABCA, and Remedial Action Plan pictured above were available for review during the Nov. 12, 2019 public meeting.

FY20 USEPA CLEAN UP GRANT
GIRARD LEATHERWORKS SITE
Project overview and presentation
Tuesday, November 12th, 2019 @ 6 PM

Site history

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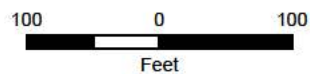
Future plans for site redevelopment (to include bike trail alignment and commercial redevelopment as indicated in Comprehensive plan)

- Please have a copy of the draft ABCA and the draft application at the meeting.
- Print off a map or two from the Phase II for reference at the meeting.
- As mentioned, assure the grant meeting is opened and closed, to set it off from other activities.
- Assure Minutes are taken.
- Provide pdfs of the Minutes, sign-in sheet, comments, responses to Lauren afterward.
- Expected timeline: grant announcements in April/May, if awarded, work activities begin late summer-early fall.

By referencing the draft ABCA and the Phase II report, BRG can respond to environmental questions.

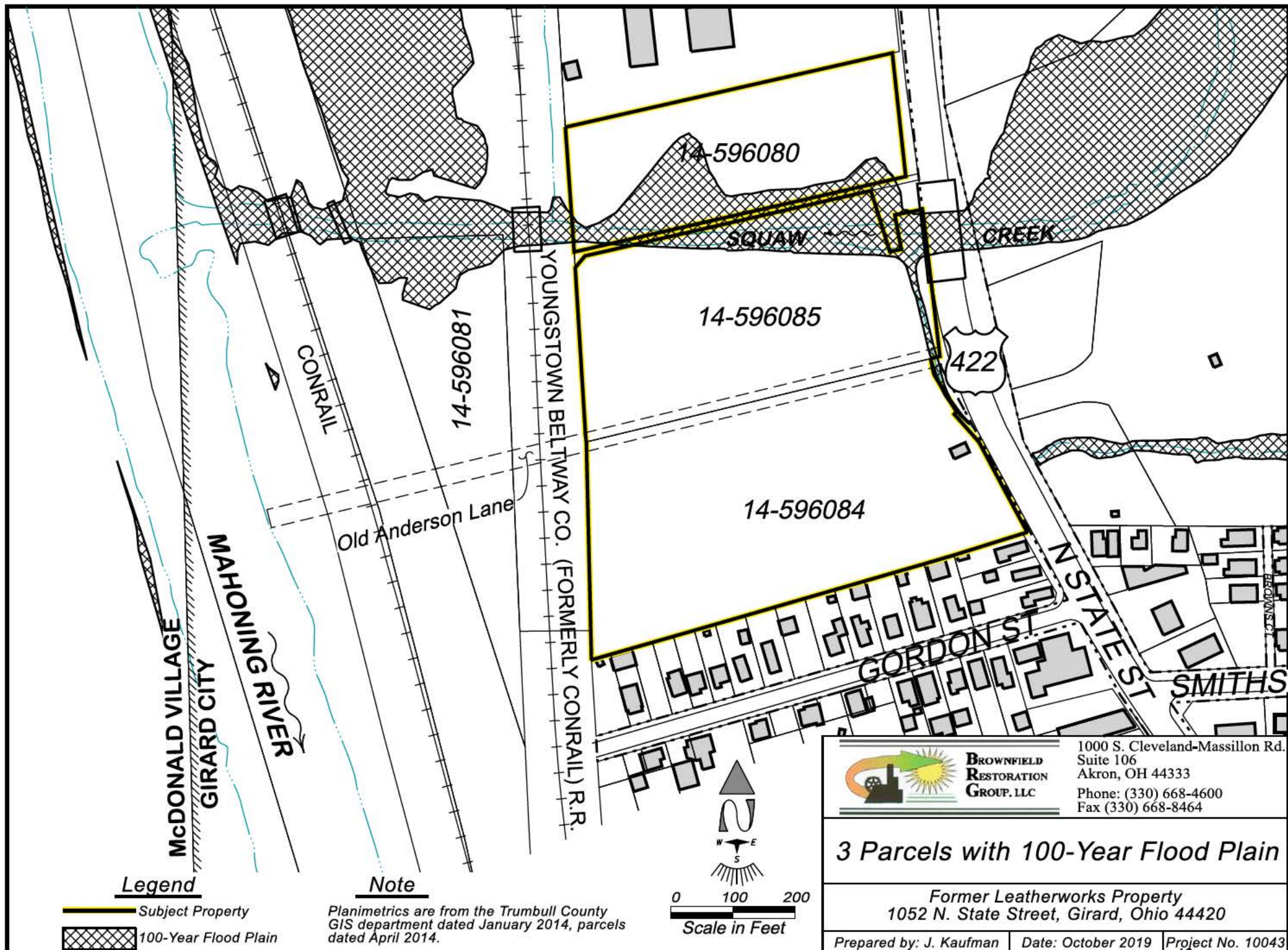


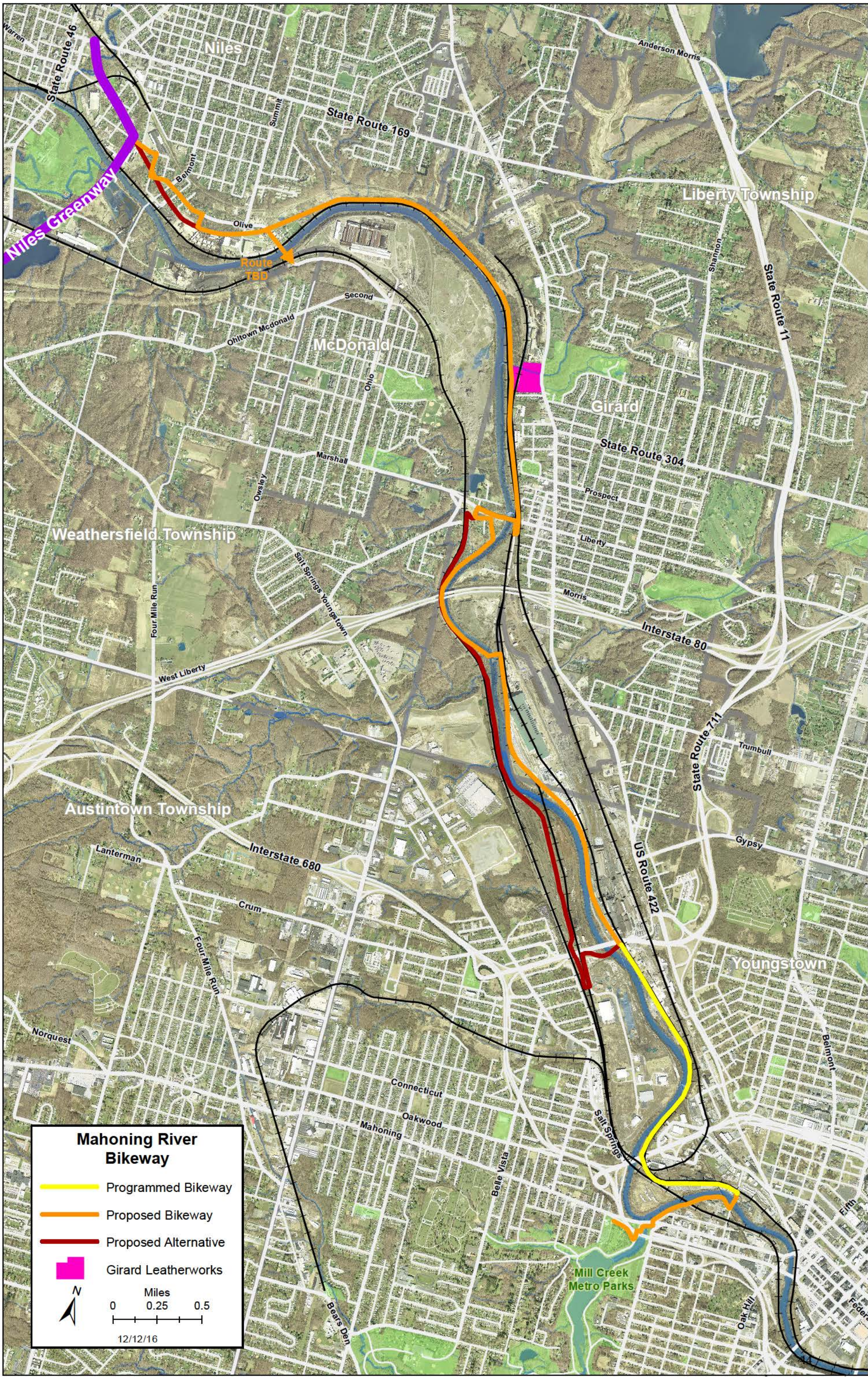
- Grant Application Parcels
- Other City of Girard-Owned Parcels
- 100 Year Floodplain



This map depicts publicly available information. It is not survey accurate. The aerial photograph may not line up exactly with other data.







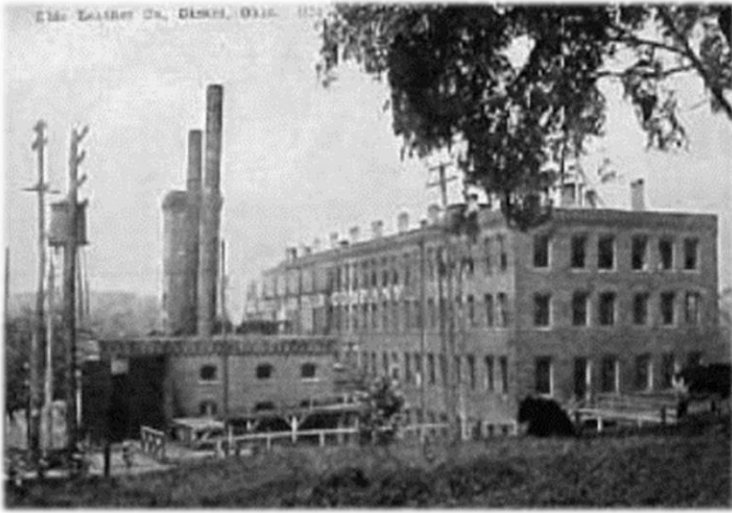
**Mahoning River
Bikeway**

-  Programmed Bikeway
-  Proposed Bikeway
-  Proposed Alternative
-  Girard Leatherworks



Miles
0 0.25 0.5

12/12/16



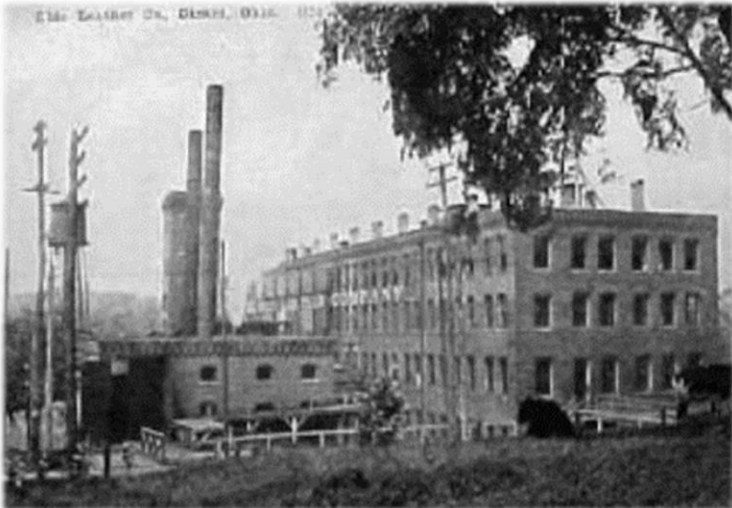
Attention Girard Residents!

The City of Girard is submitting a Brownfields Cleanup Application to the United States Environmental Protection Agency in coordination with the Youngstown-Warren Regional Chamber and the Trumbull County Planning Commission

Location of cleanup: Former Girard Ohio Leatherworks Company Site, 1052 North State Street, Girard, Ohio 44420

Why does the City of Girard need to fill out an application for Brownfields Cleanup? – To apply for funding to pay for the cleanup of contaminants on the Brownfield property to prepare for reuse of the land

****Watch www.cityofgirard.com for future community notice listings for public review location and dates****



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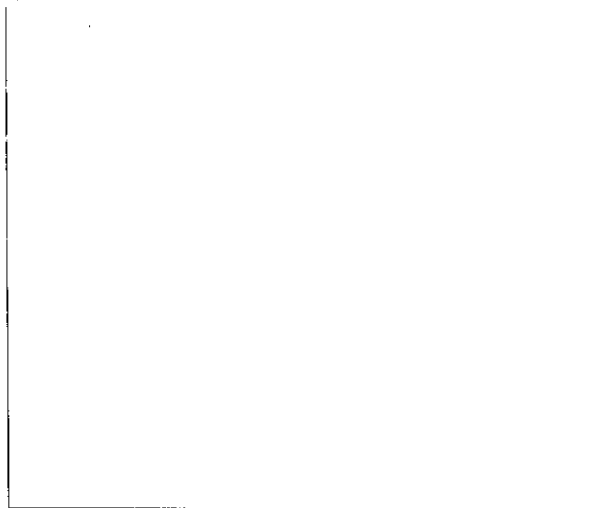
Why does the City of Girard need to fill out an application for Brownfields Cleanup? – To apply for funding to pay for the cleanup of contaminants on the Brownfield property to prepare for reuse of the land

****Watch www.cityofgirard.com for future community notice listings for public review location and dates****

Tribune Chronicle

Girard seeks grant for cleanup of former Leatherworks property

GIRARD — A grant application to clean up the former Ohio Leatherworks property has a reasonable chance of being approved, according to the Trumbull County Planning Commission.



The commission met with Girard council members Tuesday to discuss the grant process.

Girard acquired the 12.4-acre property at 1052 N. State St. in 2014.

"I've been working on this for several months to try and secure \$500,000 in grant funding, which is matched with \$100,000 from the city of

Girard. The deadline is Dec. 3, and grant announcements are expected in April or May 2020. And then if it is awarded, work will begin late summer early fall of 2020,” said Julie Green, executive director of the Trumbull County Planning Commission.

The \$600,000 will be used only for the property cleanup.

The property spans three parcels, and while the main purpose of the cleanup is to get the land prepared for commercial use, council wants to tie in some recreational aspects that include Tod Park and the property that contains the Youngstown Railway Company for a bike trail.

“Task one is going to look at the project management coordination. Task two is going to be remedial actions. The soil remediation contractor will generally work with excavation, equipment, transportation and disposal of contaminated soils with replaced clean soil,” said Nick Coggins, assistant director of the Trumbull County Planning Commission.

The property will be surveyed for hazardous material such as lead, arsenic and mercury. Then a risk assessment will be completed, followed by a risk mitigation and a remediation report preparation and update. Seven tasks are associated with the cleanup.

The grant application is still in its draft phase, and Green said she is using every resource available to make the grant more competitive.

“We’re working through a great resource at Kansas State University called Tab EZ. We’ve already submitted our first draft through this online portal application tool. Experts send us their evaluation and their pointers and their tips on how to make it a more competitive application, which I think is great. And it’s completely free software through Kansas State University,” Green said. “So we’ll be submitting our second draft soon, and then the final will be submitted through grants.gov.”

The application will get extra points for the property being waterfront and in an opportunity zone, along with using alternative energy during its redesign, according to T.J. Keiran, environmental coordinator and floodplain administrator for the Trumbull County Planning Commission.

Council approved the first reading of the resolution and scheduled two special meetings on Thursday and Friday, both at 11 a.m., in the service director's office to vote on applying for the Brownfield Cleanup grant.

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

12/03/2019

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

GIRARD, CITY OF (INC)

* b. Employer/Taxpayer Identification Number (EIN/TIN):

* c. Organizational DUNS:

1037175210000

d. Address:

* Street1:

100 W Main St

Street2:

* City:

Girard

County/Parish:

Trumbull

* State:

OH: Ohio

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

44420-2598

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Julie

Middle Name:

Marie

* Last Name:

Green

Suffix:

Title:

Organizational Affiliation:

* Telephone Number:

330-675-6620

Fax Number:

* Email:

cegreen@co.trumbull.oh.us

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-19-07

* Title:

FY20 GUIDELINES FOR BROWNFIELD CLEANUP GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Former Ohio Leatherworks 11.845 Acre Site Remediation, Girard, Ohio (Trumbull County)

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant

13

* b. Program/Project

13

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

10/01/2020

* b. End Date:

09/30/2023

18. Estimated Funding (\$):

| | |
|---------------------|------------|
| * a. Federal | 499,037.00 |
| * b. Applicant | 100,000.00 |
| * c. State | 0.00 |
| * d. Local | 0.00 |
| * e. Other | 0.00 |
| * f. Program Income | 0.00 |
| * g. TOTAL | 599,037.00 |

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☒ a. This application was made available to the State under the Executive Order 12372 Process for review on

12/02/2019

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☐ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

* First Name:

Samuel

Middle Name:

* Last Name:

Zirafi

Suffix:

* Title:

Entity Administrator

* Telephone Number:

330-545-6843

Fax Number:

* Email:

szirafi@cityofgirard.com

* Signature of Authorized Representative:

Julie M Green

* Date Signed:

12/03/2019